

## Multidisciplinary Practice

*The Team Approach to Health Care*

BREAKTHROUGH COACHING

## ACA MDP Policy Statement

- The Official ACA MDP Policy Statement was presented to the House of Delegates who passed the resolution at the March 2005 National Chiropractic Legislative Conference in Washington, DC.
- This is the first such initiative of its kind and Breakthrough Coaching is proud to have played a role in its development.



BREAKTHROUGH COACHING

## The Next Level of Success



- The decision to establish an MDP practice is beneficial to practices that have achieved a measure of success and are looking to take their business to the next level.
- It does not diminish or tarnish the basic tenets of chiropractic philosophy in any way.

BREAKTHROUGH COACHING

## Getting Started



- The addition of a multidisciplinary model requires several preliminary steps starting with the recruiting of medical personnel, as well as the creation of a proper corporate structure.
- This is necessary because, in some states, chiropractors are not permitted to own medical practices.

BREAKTHROUGH COACHING

## The Breakthrough Coaching Commitment

- For over 20 years BTC has honored our commitment to take the most conservative approach to MDP management.
- While successfully operating a MDP can be rewarding, those rewards can quickly disappear should the chiropractor not adhere to the most stringent policies and procedures.



BREAKTHROUGH COACHING

## Not Legal Slight of Hand



- An MDP is not a method to change a chiropractic practice into a medical practice with a few legal slights of hand.
- It is not a method of increasing reimbursement revenues by misrepresenting chiropractic services as medical, nor is it a method of fraudulently obtaining insurance coverage for chiropractic treatment that would otherwise not be covered.

BREAKTHROUGH COACHING

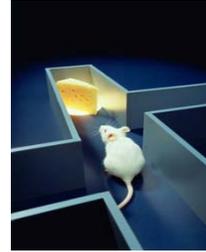
## Patient Benefits

- An MDP should be created for the benefit of its patients.
- MDPs offer patients a broader scope of coordinated services than those available in either a medical, physical therapy, or chiropractic practice alone.
- They can also deliver these services in a more efficient and cost-effective manner.



BREAKTHROUGH

## THE PARADIGMS



BREAKTHROUGH

## PARADIGM No. 1

- The Chiropractic Only Practice
- "Cure all" attitude
- Rarely refer
- Seen as back pain specialists
- See 10% vs. 90% of the population
- 95% Patient Satisfaction



BREAKTHROUGH

## PARADIGM No. 2

- The Medical Only Practice
- Focus on chart and tests
- Drugs and more drugs
- Overwhelmed by need to see volume
- Focus on crisis care



BREAKTHROUGH

## PARADIGM No. 3

- The Wellness Based MDP
- The Team Approach to Health Care
- Blends the best of both worlds into a unique model
- Focus on the patient and creating lifetime family wellness



BREAKTHROUGH

## Building the Practice

- Breakthrough Coaching requires that its' Member's practices meet professional staffing requirements
- This may include Chiropractors, Licensed Physical Therapists, Medical Physicians and Physician Extenders such as Nurse Practitioners and Physician's Assistants.



BREAKTHROUGH

## Chiropractic Services



- Chiropractic services, those services and procedures performed by a Chiropractor, are never to be incident to a Medical Physician's provider number.
- All chiropractic services are to be billed under the Chiropractor's provider number.

BREAKTHROUGH

## Physical Therapy Services

- PT services must be performed by a licensed physical therapist, or by a PTA while under the direct supervision of a licensed physical therapist.
- A current Prescription for PT services is required before any PT services are performed.



BREAKTHROUGH

## Incident to Billing



- If PT performed by a licensed Physical Therapist, is billed incident to a MD's provider number, then all notes and documentation should clearly display that a PT and not a MD performed the service.
- Chiropractic services are never billed incident to a medical license.

BREAKTHROUGH



## MDP Legal Compliance

BREAKTHROUGH

## Legal Advice

- Breakthrough Coaching is not an attorney and does not dispense legal advice.
- For legal advice, we recommend that our Members retain local legal counsel familiar with the group practice healthcare laws and regulations of the state in which the practice will be established.



BREAKTHROUGH

## No Ghost Owning Doctors

- We have a strict policy against "ghost" or "on-paper-only" physician ownership.
- In states that require an MD to own all or part of the stock of a PC or PA, the owning physician must have a documented, and ongoing role in the practice.
- All stockholders of the PC/PA should make a financial contribution to that corporation.



BREAKTHROUGH

## No Blended Billing



- The provider that performs the service must be identified on the claim form.
- **Chiropractic services, those services and procedures performed by a DC, are never to be billed under an MD's provider number.**
- All chiropractic services are billed under the DC's provider number.
- MD and PT services are similarly identified.

BREAKTHROUGH

## Federal Health Insurance Programs

- Patients with Medicare or any other Federal Health Insurance Program should not be processed as MDP patients, unless the physician level staff meets the 75% Rule Federal staffing requirement and are present in the facility at the time the services are rendered.
- **If the 75% Rule Staffing Requirement is not met, patients of the practice can receive chiropractic care based upon their consent and medical necessity.**



BREAKTHROUGH

## No Standing Orders



- Standing Orders are when services are billed under the Medical Physician's provider number prior to the MD examining the patient, writing a diagnosis, and ordering care.
- **A multidisciplinary practice should have a strict policy against "standing orders".**

BREAKTHROUGH

## Diagnostic Testing

- All diagnostic testing procedures should be based upon medical necessity.
- **If diagnostic testing services are performed using an outside service, documentation of compliance to the Stark Regulations should be obtained.**
- Paying for equipment or technicians on a per test, or volume basis is a violation of the Stark Regulations.
- X-rays taken in the Multidisciplinary Practice should be over-read by a Radiologist when ordered by a medical physician untrained in radiographic interpretation.

BREAKTHROUGH

## Ancillary Procedures

- Based upon the specialty of the MDs in the practice, there are many options that allow patients to receive an increased scope of services in the MDP.
- **Primary Care**
- **Medically Supervised Weight Loss**
- **Allergy Testing**
- **Pain Management**
- **Esthetic Medicine**
- **Regenerative Medicine**

BREAKTHROUGH

## No Bouncing!



- Patients may not receive care under more than one tax identification number in which an owning physician has a financial interest.
- **Patients are not to "bounce" back and forth between tax id numbers.**
- An MDP is a group practice working under one tax ID number, and identifies services performed by the individual practice members by provider number.

BREAKTHROUGH

## No Duplication

- No duplication of services should occur by the various Multidisciplinary Practice professional providers.
- For example, Manual Therapy, 97140, should not be billed under a Chiropractor's provider number and also under a Physical Therapist's provider number.



BREAKTHROUGH  
CHIROPRACTIC

## Independent Treatment Protocol

- All professional staff should to adopt a set treatment protocol, or algorithm for care, for patients seen in the Multidisciplinary Practice.
- Professional staff members should function in an independent and coordinated fashion.
- Documentation of this agreement should be maintained.



BREAKTHROUGH  
CHIROPRACTIC

## Compliance Program

- An MDP must have an effective Compliance Program in place.
- This includes the designation of a Compliance Officer, a baseline Compliance audit and annual Compliance audits.
- The fee schedule of the MDP should be reasonable and customary for the region in which the practice is located.



BREAKTHROUGH  
CHIROPRACTIC

## The DC to MDP Transition

*The Team Approach to Care*

BREAKTHROUGH  
CHIROPRACTIC

## Numbers, Numbers, Numbers

- Once you have established a Multidisciplinary Corporation and have received your new Tax ID number, the first step is to inform the insurance plans you currently participate with.
- This step informs the carrier that you have a new Tax ID/EIN number.
- Print it on pink paper and staple it to the CMS-1500 forms until the insurance company recognizes your new Tax ID number.

NEW TAX ID NUMBER \_\_\_\_\_

Date \_\_\_\_\_

To Whom It May Concern:

Please be informed that I will be practicing under the tax id number \_\_\_\_\_ at the Clinic named \_\_\_\_\_

Please make any necessary changes in your system to expedite the processing of this claim and any future claims.

Thank you for your attention to this information.

Sincerely,

Dr. \_\_\_\_\_

BREAKTHROUGH  
CHIROPRACTIC

## DC HMO/PPO Provider Plans

- In some cases, you will need to reestablish provider numbers or Personal Identification Numbers (PINs) associated with the new EIN.
- You may need to establish provider numbers for existing and new professional staff members. (Credentialing)
- Use the following dialogue: "May I please speak with our Provider Relations Representative..."
- You should have the name of your rep.
- "Hello. We are currently a Provider of chiropractic services on your plan."



BREAKTHROUGH  
CHIROPRACTIC

## Changing Your EIN

- “We are considering opening a multispecialty clinic and this will require us to update our EIN.”
- “We will continue to provide the same services we do now and will add a wider range of services, such as medical, physical therapy, etc...”
- “Will this alter our status as a Provider?”
- “What is your procedure for changing a Provider’s EIN?”



BREAKTHROUGH

## Who May See the MD or PT?

- Not every patient under the new multidisciplinary Tax ID number must be seen by the Medical or PT.
- Only when submitting bills under the Medical or PT’s license is it mandatory that the patient be evaluated and re-evaluated by the appropriate professional so that he or she can prescribe and direct care.
- Those patients who are not receiving medically supervised care, may receive chiropractic care, billed under the chiropractor’s provider number.



BREAKTHROUGH

## Federal Health Insurance Reminder

- It is important to understand the “Incident To” billing rules as well as the 75% Rule Federal Staffing requirement when treating patients with Medicare, Medicaid, or any other Federal Health Insurance Coverage.
- If your practice does not meet the “Incident To” rules, incident to billing of physical therapy services under a medical license should never occur.
- If you do not meet the 75% Federal Staffing Requirement, patients may be seen only by the chiropractic staff, based upon medical necessity, and will not be eligible for medical or physical therapy services.
- If you are unfamiliar with these regulations, please review the Compliance modules on our website.

BREAKTHROUGH

## A Stepwise Transition

- You do not have to transfer all the patients who will see the Medical or PT over to the new Tax ID number at once.
- A stepwise manner is more efficient and supportive to the office flow and the practice team.
- Select the patients who will be the first to see the Medical or PT based upon medical necessity, by reviewing which phase of care they are in, and be sure to check their insurance status to be sure you meet the plan’s requirements and are a Provider on the plan.



BREAKTHROUGH

## Patient Voluntary Consent

- Patients who had been previously treated or who are currently under care in the solo chiropractic practice must sign a Patient Voluntary Consent prior to transferring to multidisciplinary care under the new Tax ID number.
- This is to comply with the Stark anti-self-referral law.

BREAKTHROUGH

## Introduce the Multidisciplinary Concept

- “Mary, I’ve got some great news, John Smith is joining our practice team.”
- John is a MD/PT and we are very fortunate to have someone of his caliber joining our staff.
- This means that along with the benefit of the eyes and the hands of a chiropractor you will have the eyes and the hands of an MD/PT working together to give you the very finest care available.”



BREAKTHROUGH

## Dialogue Adding Medical

- Reassure the patient: "It is important that you know that Dr. Smith will not replace your current medical provider or family physician – in fact, we'll be happy to send your doctor a report of your progress."
- Dr. Smith will only help us with the care that you are receiving here at our office.
- Just like you see me for re-evaluations during care, you will see Dr. Smith throughout your care for check-ups as well.
- Our entire practice team will meet on a regular basis to discuss your progress and plan of care."



BREAKTHROUGH

## Prepare Ahead

- Make sure you and your staff do as much preparing for the day as possible before patients arrive; or even better, the evening before their visit.
- This will give you adequate time to prepare the necessary files and paperwork in advance.
- The first visit with a new professional will take more time and the patient should be advised to adjust their personal schedule accordingly.



BREAKTHROUGH

## At the Forefront of Health Care

- The demand for the ancillary services is being driven by the "baby boomer" demographic.
- The ability to provide these high-demand services can place your multidisciplinary practice at the forefront of the changing landscape of health care.
- The boomer market is big, demanding and full of potential.
- Those practices that anticipate their needs and innovate will capitalize on this important segment for years to come.

BREAKTHROUGH

## What Breakthrough Does for You

- Advise on the recruitment of medical/physical therapy personnel
- Work with your attorney in the selection of the appropriate state-specific corporate structure
- Training each respective department and discipline



BREAKTHROUGH

## What Breakthrough Does for You



- Assist with interprofessional communications
  - Accountant
  - Attorney
  - Professional Staff
  - Financial Planner

BREAKTHROUGH

## What Breakthrough Does for You

- Advise on the purchase of supplies and equipment
- Advise on capitalization needs for changeover and monthly operating expenses
- Administrative protocols for operating the MDP
- Advise on proper billing and additional coding procedures in the MDP



BREAKTHROUGH

## What Breakthrough Does for You

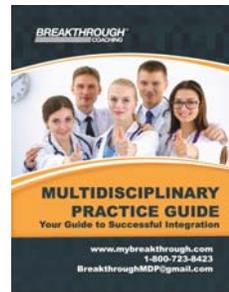
- Advise on marketing and new patient acquisition for the MDP
- Develop relationships with community based physicians
- Creation and development of Quality Assurance & Compliance Program



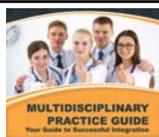
BREAKTHROUGH  
CONCEPTS

Text COCSA1118 to 33444

- Download your Multidisciplinary Practice Guide to Successful Integration right now.



BREAKTHROUGH  
CONCEPTS



## Multidisciplinary Practice

*The Team Approach  
to Health Care*

BREAKTHROUGH  
CONCEPTS