

Centers for Medicare & Medicaid Services (CMS) **BASIC** billing

for Anesthesia services provided by Anesthesiologists and Certified Registered Nurse Anesthetists (CRNAs)

- CMS utilizes a series of billing terms and associated billing modifiers as a means to submit claims for reimbursement
- CMS requires physician supervision under Medicare Part A, Conditions of Participation (COP) in order to submit claims for reimbursement – this supervision **DOES NOT have to be an anesthesiologist**
- “The medical direction requirements **are not quality of care standards.**” - Federal Register Vol. 63, No. 211, page 58843
- “The term medical direction is used for **payment purposes only.**” - Massachusetts Code of Regulations at 130 CMR 433.434 (C)
- TEFRA (Tax Equity and Fiscal Responsibility Act of 1982) – developed to close tax loopholes to reduce budget gap
- QZ modifier DOES NOT prevent anesthesia providers from working within an anesthesia care team. It simply relieves MD anesthesiologists from having to meet TEFRA requirements, allows utilization of all anesthesia providers in the most cost-efficient manner without compromising safe patient care, decreases Medicare fraud, DOES NOT change provider liability

Medical Direction

Billing Modifiers

MD: QK 50%
CRNA: QX 50%

IF Anesthesiologist is supervisor
Max ratio: 1 Anesthesiologist ≤ 4 CRNAs

Anesthesiologist must document TEFRA 7 points of “Medical Direction”

1. perform a pre-anesthetic exam and evaluation
2. Prescribe the anesthesia plan
3. Personally participate in the most demanding procedures in the anesthesia plan, including, if applicable, induction and emergence
4. Ensures that any procedures in the anesthesia plan are performed by a qualified anesthetist
5. Monitors the course of anesthesia administration at frequent intervals
6. Remains physically present and available for immediate diagnosis and treatment of emergencies
7. Provides indicated post-anesthesia care

Medical Supervision

Billing Modifiers

MD: AD 30%
CRNA: QX 50%

May be ratio of EITHER
A) Anesthesiologist OR
B) Operating Practitioner ≥ 5 CRNAs

Not recognized in Massachusetts for MassHealth/Medicaid

Non-Medically Directed

Billing Modifiers

MD: none 0%
CRNA: QZ 100%

- **No ratios required**
- **Allows CRNAs & Anesthesiologists and/or operating practitioners to work as a team without the TEFRA restrictions of Medical Direction**
- **Enables facilities to use their workforce in the most productive and cost-efficient manner possible**
- **NO LEGAL IMPEDIMENT IN MASSACHUSETTS**
- *****MOST COST-EFFECTIVE BILLING OPTION*****

Anesthesiologist Personally Performing Anesthesia Alone

Billing Modifiers

MD: AA 100%
CRNA: none 0%

Direction of 1 CRNA by an Anesthesiologist

Billing Modifiers

MD: QY 50%
CRNA: QX 50%

Opt-Out

- refers to the 2001 decision made by CMS to allow states to opt out of the Federal Supervision requirement for CRNAs under Medicare Part A, COP
- As of 2018, there are 17 states that have exercised their right to opt out.

Billing Modifiers

MD: none 0%
CRNA: QZ 100%

- | | | |
|------------------|-----------------|------------------|
| 1. Iowa | 7. Kansas | 13. South Dakota |
| 2. Nebraska | 8. North Dakota | 14. Wisconsin |
| 3. Idaho | 9. Washington | 15. California |
| 4. Minnesota | 10. Alaska | 16. Colorado |
| 5. New Hampshire | 11. Oregon | 17. Kentucky |
| 6. New Mexico | 12. Montana | |

