Billing Collaborative Care Services

Section 5

OBJECTIVES & LEARNING OUTCOMES

Objective

Review how to bill CoCM services using the CoCM codes

Learning Outcomes

Discuss billing codes, billing thresholds, and documentation to promote the financial sustainability of CoCM services

CONSIDERATIONS

- We are discussing guidelines per our understanding of the CMS requirements for CoCM services
- Please check with your billing and compliance officers and payer representatives
- Guidelines may vary by payer
- Send billing questions to valuepartnerships@bcbsm.com

Billing Collaborative Care Services

Billing Basics

- Billed per member per calendar month
- Minutes billed reflect time billed by all members of the care team triad. BHCM is typically central point of contact, so count BHCM time for CoCM; can't duplicate shared time, e.g., 10-minute case review with BHCM and psychiatrist counts as 10 minutes and not 10 minutes for the BHCM and 10 minutes for the psychiatrist.
- Requires separate Initiating Billable Visit for patients not seen within one year
- CoCM can be billed alone or with a claim for another billable visit
- Can bill CoCM services with PDCM claims if appropriate
- Can't bill CoCM (99492, 99493, 99494, G0512) services in the same calendar month as general behavioral health integration (99484, G0511)
- Claims need to be submitted under the rendering physicians NPI.
- The PCP is responsible for payment to the psychiatrist.
- CoCM is currently payable for all groups in Blue Care Network, Blue Care Network Advantage, Blue Cross products and Medicare Plus Blue.

Billing Collaborative Care Services

Obtaining Advance Patient Consent

Advance Consent

- Verbal or written, must be documented in the EHR
- Permission to consult with relevant specialists (i.e., psychiatric consultant)
- Inform the patient of cost sharing

Sample language:

"I have discussed [practice's] collaborative care program with the patient, including the roles of the behavioral health care manager and psychiatric consultant. I have informed the patient that they will be responsible for potential cost sharing expenses for both in-person and non-face-to-face services. The patient has agreed to participate in the collaborative care program and for consultations to be conducted with relevant specialists.

Face-to-face or telehealth visits with a behavioral health specialist are not associated with this model, even though they may be part of the patient's overall treatment plan. Services that are not a part of collaborative care can be provided and will be billed according to the patient's benefit package. These services would also be subject to the cost sharing expenses defined by that benefit plan."

Billing Collaborative Care Services

Billing Codes: Commercial Members, Any Location

Provider Location	Service	Code	Month	Time Threshold
Any Location	General Behavioral Health Integration	99484	Any month	11-20 minutes
	CoCM	99492	Initial month	36-70 minutes
		G2214	Initial or subsequent month(s)	16-30 minutes
		99493	Subsequent month(s)	31-60 minutes
		99494	Add-on code**	16-30 minutes

Billing Collaborative Care Services

Codes for Medicare Advantage Members by Location (Rules differ for Federally Qualified Health Centers and Rural Health Clinics)

Provider Location	Service	Code	Month	Time Threshold
Non-FQHC/RHC	General Behavioral Health Integration	99484	Any month	11-20 minutes
	CoCM	99492	Initial month	36-70 minutes
		G2214*	Any month	16-30 minutes
		99493	Subsequent month(s)	31-60 minutes
		99494	Add-on code	16-30 minutes
FQHC/RHC	Chronic Care Management/General Behavioral Health Integration *Cost share applies to this code related to state/federal rules	G0511	Any month	20 minutes
	CoCM	G0512	Initial month	70 minutes
			Subsequent month	60 minutes

Billing Collaborative Care Services

Federally Qualified Heath Centers/Rural Health Clinics when Treating Medicare, MA and Medicaid members

- **G0512** – Psychiatric Collaborative Care Model services: Minimum of 70 minutes in the first calendar month and at least 60 minutes in subsequent calendar months. Minutes counted towards the time threshold are those of the behavioral health care manager only. The valuation of the codes includes the time of the psychiatric consultant and treating medical provider, who bill usual codes for any E/M or evaluation services.
- **FQHCs** and **RHCs** do not recognize the CPT time rule nor the add-on code for additional time. You must provide the full 70 (initial) or 60 (subsequent) minutes before billing for the service and sites are not paid for any additional time.
- Go to CMS.gov for more information.

Billing Collaborative Care Services

Medicaid Guidelines

Effective August 1, 2020

- Psychiatric consultant must have MD or DO licensure
- Initial visit must be face-to-face
- Monthly administration of outcome measures (e.g., PHQ-9, GAD-7)
- After the initial 6 months of treatment, prior authorization is required for an additional 6 months of treatment
- Can't bill G0511
- Can't bill CoCM patients receiving MI Care Team, Behavioral Health Home, or Opioid Health Home benefits
- Can't bill 99494

The policy can be found here.

G2214 – Why Was This Code Established 1/1/21?

CMS developed HCPCS code G2214 in response to requests from stakeholders who reported the need for additional coding to capture shorter increments of time spent with a patient. This type of situation may occur, for example, when a patient is seen for services, but is then hospitalized or referred for specialized care and the number of minutes required to bill for services using the current coding is not met. Thus, to accurately account for these resources, CMS created HCPCS code G2214.

Billing Collaborative Care Services

Procedure Codes 99492, 99493, 99494, and G2214

- **99492 -** Initial Psychiatric Collaborative Care Management; first 70 minutes in the first calendar month of behavioral health care manager activities, in consultation with a psychiatric consultant, and directed by the treating physician or other qualified health care professional. This code may only be billed once per calendar year.
- **G2214** - Initial or subsequent psychiatric collaborative care management, first 30 minutes in a month of behavioral health care manager activities, in consultation with a psychiatric consultant, and directed by the treating physician or other qualified health care professional
- **99493** Subsequent Psychiatric Collaborative Care Management; first 60 minutes in a subsequent month of behavioral health care manager activities, in consultation with a psychiatric consultant, and directed by the treating physician or other qualified health care professional.
- **99494 -** Initial or Subsequent Psychiatric Collaborative CM; each additional 30 minutes in a calendar month of behavioral health care manager activities, in consultation with a psychiatric consultant, and directed by the treating physician or other qualified health care professional (List separately in addition to code for primary procedure)

**** Blue Cross removes unit restrictions on 99494, meaning 3+ units can be billed. However, there is a known error that prevents >2 units for MA (Blue Cros Medicare Advantage) patients. A change request has been submitted and will be processed with no ECD (Estimated Completion Date).**

Billing Collaborative Care Services

Required Elements to Bill Codes 99492, 99493, 99494 and G2214

- Outreach to and engagement in treatment of a patient directed by the treating physician or other qualified health care professional
- Initial assessment of the patient, including administration of validated rating scales, with the development of an individualized treatment plan
- Review by the psychiatric consultant with modifications of the plan if recommended
- Entering patient in a registry and tracking patient follow-up and progress using the registry, with appropriate documentation, and participation in weekly caseload consultation with the psychiatric consultant
- Provision of brief interventions using evidence-based techniques such as behavioral activation, motivational interviewing, and other focused treatment strategies

Billing Collaborative Care Services

99484 – General Behavioral Health Integration, Not CoCM

Care management services for behavioral health conditions, at least 20 minutes of clinical staff time, directed by a physician or other qualified health care professional time, per calendar month, with the following required elements:

- Initial assessment or follow-up monitoring, including the use of applicable validated rating scales
- Behavioral health care planning in relation to behavioral/psychiatric health problems, including revision for patients who are not progressing or whose status changes
- Facilitating and coordinating treatment such as psychotherapy, pharmacotherapy, counseling and/or psychiatric consultation
- Continuity of care with a designated member of the care team

Billing by Time Threshold:

CPT Codes

Month	Time Spent	CPT Codes
Initial Month	≤10 minutes	Not billable
	11-35 minutes	99484 – Gen BHI
	36-85 minutes	99492
	16-30 minutes	G2214
	86-115 minutes	99492 + 99494
	116-130 minutes	99492 + 99494, quantity 2 units
Subsequent Month(s)	≤10 minutes	Not billable
	16-30 minutes	G2214
	31-75 minutes	99493
	76-105 minutes	99493 + 99494
	106-135 minutes	99493 + 99494, quantity 2 units

Billing Collaborative Care Services

What Activities Can I Include?

- Providing assessment and care management services
  - Any form of patient contact
  - Structured behavioral health assessment
  - Self-management planning; relapse prevention planning
  - 99492 requires an initial assessment of the patient and development of individualized treatment plan
- Administering validated outcome measures (e.g., PHQ-9, GAD-7)
- Using brief therapeutic interventions (e.g., Motivational Interviewing, behavioral activation, problem solving therapy)
- Conducting systematic case review with the psychiatric consultant

Billing Collaborative Care Services

What Activities Can I Include? (continued)

- Maintaining systematic case review tool, disease registry, and/or EHR for patient tracking and follow-up
  - Does not include strictly administrative or clerical duties
- Collaboration and coordination with PCP or other qualified health care professionals
- "Running" the caseload with the psychiatric consultant (i.e., conducting a systematic review of caseload without specifically discussing the patient)
  - Approximately 5 billable minutes per calendar month
  - "the patient has been included in the caseload review activities and consulted on as needed"

Billing Collaborative Care Services

Scenario A: Chronic Care Management/General Behavioral Health Integration Code

Date	Activity	Time Spent
1/15/21	Patient A admitted to hospital for diffuse symptoms – back pain, headache, no physical diagnosis confirmed; diagnosed with depression. **PDCM phones** the patient and conducts a post-discharge call.	30
1/15/21	PDCM reviews the case with the BHCM. The BHCM outreaches to the patient and completes a PHQ9 screening and schedules a follow up visit to determine ongoing needs. Patient does not meet CoCM requirements	15
	BHCM Total: Bill 99484	**15**

Billing Collaborative Care Services

Scenario B: Pre-enrollment to CoCM

Date	Activity	Time Spent
1/31/21	Patient screened for depression, referral to BHCM made. BHCM meets briefly with the patient, describes the CoCM model and benefits. The patient has not decided on participating	20
	BHCM Total: Bill 99484	**20**

Billing Collaborative Care Services

Scenario C: Enrollment to CoCM Near Month End (Initial month)

Date	Activity	Time Spent
1/29/21	Patient screened for depression, referral to BHCM made. BHCM meets briefly with the patient, describes the CoCM model and benefits. The patient has decided to participate.	15
1/30/21	BHCM/psychiatric consultant 'ran' the systematic case review	5
	BHCM Total: Bill G2214	**20**

Billing Collaborative Care Services

Scenario C: Enrollment to CoCM Near Month End (Subsequent Month)

Date	Activity	Time Spent
2/4/21	Patient screened for depression. BHCM meets with the patient, provides assessment, motivational interviewing, and develops individualized treatment plan.	40
2/14/21	BHCM contacts patient; BHCM administers PHQ9/GAD7; BHCM updates SCR tool.	35
2/27/21	BHCM discusses patient with psychiatric consultant in systematic case review	10
No date	BHCM/psychiatric consultant 'ran' the systematic case review	5
	Total: Bill 99493 + 99494	**90**

Billing Collaborative Care Services

Scenario 1: Initial Month, Commercial Patient

Date	Activity	Time Spent
2/2/21	Patient enrolled in CoCM services; BHCM conducted initial assessment; BHCM administered PHQ-9/GAD-7; BHCM updated SCR tool	45
2/7/21	BHCM discussed patient with psychiatric consultant during SCR; BHCM followed-up with PCP; BHCM updated SCR tool	15
2/8/21	BHCM followed-up with patient	5
2/22/21	BHCM followed-up with patient; BHCM delivered Problem Solving Therapy	20
No date	BHCM/psychiatric consultant 'ran' the systematic case review	5
	Total: Bill 99492 + 99494	**90**

Billing Collaborative Care Services

Scenario 2: Subsequent Month, Commercial Patient

Date	Activity	Time Spent
3/5/21	BHCM administer PHQ9/GAD7, scores show improvement; BHCM delivers behavioral activation	20
3/25/21	BHCM contacts patient, patient doing well	8
No date	BHCM/psychiatric consultant ‘ran’ the systematic case review	5
	Total: Bill 99493	**33**

Billing Collaborative Care Services

Scenario 3: Subsequent Month, Commercial Patient

Date	Activity	Time Spent
3/5/21	BHCM administers PHQ9/GAD7, scores show worsening symptoms; BHCM delivers behavioral activation; BHCM updates SCR tool	25
3/8/21	BHCM discusses patient with psychiatric consultant in systematic case review	10
3/10/21	BHCM follows-up with PCP, approves new medication; BHCM contacts patient	15
3/18/21	BHCM contacts patient; BHCM delivers Motivational Interviewing	15
3/28/21	BHCM contacts patient; BHCM administers PHQ9/GAD7; BHCM updates SCR tool	20
No date	BHCM/psychiatric consultant 'ran' the systematic case review	5
	Total: Bill 99493 + 99494	**90**

Billing Collaborative Care Services

Scenario 4: Subsequent Month, Commercial Patient

Date	Activity	Time Spent
3/12/21	BHCM contacts patient, patient doing well - PHQ9 from 8 – 5	15
No date	BHCM/psychiatric consultant ‘ran’ the systematic case review	5
	Total: Bill G2214	**20**

Billing Collaborative Care Services

Best Practices

- **Have you documented all billable time?**
  - Create a smartphrase to prompt BHCMs to document billable time
  - Create a documentation checklist to ensure all BHCM clinical time is calculated
  - Add an EHR form to calculate billable time per calendar month
- **Review a report of documented billable minutes per patient per calendar month**
  - Review this report half-way through each month to determine which patients would need additional time to reach the next billing threshold
  - Assess distribution of time across the entire caseload
- **Is your clinical time being optimized for your caseload size?**
  - Conduct a clinical caseload supervision
  - Assess opportunities to keep the caseload “fluid” (i.e., who could benefit from a different level of care?)

Billing Collaborative Care Services

Evaluating Time Delivered Across Caseload

Patient	Mar-20	Apr-20	May-20	Jun-20	July-20	Aug-20
A	20	35	0	35	30	0
B	65	35	20	25	15	0
C	20	25	20	10	0	0
D	70	50	40	10	5	20
E	75	55	15	25	55	35
F	80	35	20	35	85	40
G		70	45	35	0	40
H		95	45	80	105	65
I		70	20	30	0	35
J			60	60	30	30
K			145	60	0	65

Month	Time Spent	CPT Codes
Initial Month	≤10 minutes	Not billable
	11-35 minutes	99484
	16-30 minutes	G2214
	36-85 minutes	99492
	86-115 minutes	99492 + 99494
	116-130 minutes	99492 + 99494, quantity 2 units
Sub. Month(s)	≤10 minutes	Not billable
	11-30	99484
	16-30 minutes	G2214
	31-75 minutes	99493
	76-105 minutes	99493 + 99494
	106-135 minutes	99493 + 99494, quantity 2 units

Billing Collaborative Care Services

Evaluating Time Delivered

Patient	Mar-20	Apr-20	May-20	Jun-20	July-20	Aug-20
A	20	35	0	35	30	0
B	65	35	20	25	15	0
C	20	25	20	10	0	0
D	70	50	40	10	5	20
E	75	55	15	25	55	35
F	80	35	20	35	85*	40
G		70	45	35	0	40
H		95*	45	80*	110**	65
I		70	20	30	0	35
J			60	60	30	30
K			145***	60	0	65

Month	Time Spent	CPT Codes
Initial Month	≤10 minutes	Not billable
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	76-105 minutes	99493 + 99494
	106-135 minutes	99493 + 99494, quantity 2 units

Billing Collaborative Care Services

Avoiding "same date" Denials

99492 and 99493 in the same month	You wouldn't bill an initial month (99492) and a subsequent month (99493) in the same month
99492 and G2214 in the same month	99492 is initial month, so you wouldn't combine with G2214, a code that could either be initial month or subsequent month. If you need to bill more minutes than 99492 provides, you'd bill 99492 and units of 99494. If you don't have enough minutes to bill 99492, you would bill G2214 alone.
99493 and G2214 in the same month	99493 is subsequent month, so you wouldn't combine with G2214, which is a code that could be either initial or subsequent month. If you need to bill more minutes than 99493 provides, you'd bill 99493 and units of 99494. If you don't have enough minutes to bill 99493, you would bill G2214 alone.
G2214 and 99494 in the same month	99494 is intended to be used as the add on to 99492 or 99493. The system isn't configured to allow G2214 to be billed with an add-on code.
99492 and 99492	You wouldn't bill two initial month codes in the same month.
99493 and 99493	You wouldn't bill two subsequent month codes in the same month.
G2214 and G2214	G2214 can be used for either an initial month or a subsequent month. However, it would only be used if there weren't enough minutes of activity to bill a either the initial month 99492 code or subsequent month 99493. To maximize reimbursement, whenever possible, use the 99xxx codes rather than G2214.
99494 and 99494	99494 is an add-on code and will not be payable unless it is combined with an initial month (99492) or subsequent month (99493) code. 99494 allows quantity units. If you are thinking of using 99494 twice, bill "99494 – Two units" instead.

Billing Collaborative Care Services

Resources

- Medicare Learning Network CoCM Fact Sheet
- Medicare Learning Network FAQ
- MDHHS MSA Bulletin (Medicaid)
- Guide to Billable Activities
- Guide to Optimizing Billable Time
- https://www.bcbsm.com/content/dam/microsites/corpcomm/provider/VPU/2020/apr/0420b.html
- BCBSM billing guidance is posted on the PGIP collaboration site

Questions?