<table>
<thead>
<tr>
<th>DEPARTMENT:</th>
<th>SUBJECT: E/M Table of Risk and Parenteral Controlled Substances</th>
<th>POLICY NUMBER:</th>
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<td>Business Groups, Education Dept., Medical Depts., and Physician Billing Compliance</td>
<td>TB 15-04-001</td>
<td>2015-07-001</td>
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A/R OR G/L ACCOUNTS AFFECTED: N/A

EFFECTIVE DATE: July 1, 2015

BACKGROUND / PURPOSE:

There are three elements of medical decision making according to the CMS Documentation Guidelines for Evaluation and Management Services (both 1995 and 1997 versions):

- the number of possible diagnoses and/or the number of management options that must be considered;
- the amount and/or complexity of medical records, diagnostic tests, and/or other information that must be obtained, reviewed and analyzed; and
- the risk of significant complications, morbidity and/or mortality, as well as comorbidities, associated with the patient's presenting problem(s), the diagnostic procedure(s) and/or the possible management options ("Risk").

To qualify for a given level of medical decision making, two of the three elements above must be met.

One of these elements is Risk. To assist with determining the overall level of Risk, CMS developed a "Table of Risk" which is divided into three categories:

- Presenting Problem(s);
- Diagnostic Procedure(s) Ordered; and
- Management Options Selected.

The highest level of Risk in any one category (presenting problem(s), diagnostic procedure(s), or management option) determines the overall Risk.

When the management option selected under the Table of Risk is "parenteral controlled substances," a high level of overall Risk may be assessed.

PROCEDURE / POLICY:

In an effort to apply the definition of "parenteral controlled substances" consistently, the UF College of Medicine – Jacksonville Compliance Committee has determined that the Food and Drug Administration’s list of controlled substances will be the source when determining whether a substance is to be considered "controlled."
The route of administration (whether actual or ordered) will determine whether the substance meets the definition below of "parenteral."

Definitions

Parenteral - substance is given by a route other than the alimentary canal.

The route of administration (whether actual or ordered) will determine whether the substance meets the definition of "parenteral."

Controlled substance – a schedule I, II, III, IV, or V drug or other substance.

The Food and Drug Administration website references schedules of controlled substances as defined under 21 CFR1308.

Link to schedules of controlled substances via FDA website:


This information is updated periodically. As such, the Office of Compliance advises that the website be accessed real-time, as needed, instead of referencing a previously downloaded list.