COMPLIANCE ALERT

TO: Department Chairs, Compliance Leaders, Residency Program Directors, and UFJPI Management

FROM: Maryann C. Palmeter, CPC, CENTC
Director, Office of Physician Billing Compliance

SUBJECT: 1997 E/M Guidelines for Extended HPI now Apply to 1995

DATE: October 2, 2013

CMS allows providers to apply either the 1995 E/M documentation guidelines or the 1997 guidelines but they cautioned that we could not mix and match aspects of one set of guidelines with the other. For example, we could not use both the 1995 physical exam and the 1997 History of Present Illness (HPI).

The 1995 E/M documentation guidelines for an extended History of Present Illness (HPI) require four or more elements of the HPI or associated comorbidities. CMS provided no additional guidance on the “associated comorbidities” piece. An extended HPI under the 1997 guidelines allows a bit more leeway in that the status of at least three chronic or inactive conditions may be documented in lieu of at least four elements of the HPI.

Effective 09/10/13, CMS is allowing providers to utilize the 1997 documentation guidelines for an extended HPI even when they are applying the 1995 documentation guidelines to support the remaining components of the E/M service.

Please share this information with all faculty, residents, nonphysician practitioners and coding staff.


cc: Daniel Wilson, M.D., Ph.D.
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