

Expanding Billing Opportunities and Finer Points

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- Understand different UBO rate structures and how they are applied
- Review rate structure and charging concepts for DoD-VA Resource sharing and available estimators
- Learn how to search for additional billing opportunities
- Assess how the Patient Protection and Affordable Care Act (PPACA) might impact MTFs
- Reduce lost revenue from pharmaceuticals requiring Pre-authorization



Understanding Different UBO Rate Structures and How They Are Applied



- There are four widely used billing rate structures intended to recover costs in the fixed facilities of the Defense Health Program
 - Full or Third Party
 - Interagency
 - International Military Education and Training(IMEPT)
 - Department of Defense Department of Veterans Affairs (DoD-VA) Sharing
- The DHA UBO Program Office also recommends billing rates for contractors and foreign nationals supporting deployed forces
- There are additional rate structures used to a lesser degree that will not be covered in this Webinar
- Patient Category (PATCAT) assignment drives the assignment of the applicable rate structure

Full Or Third Party Collection Rates



- Full /TPC Billing rates are used synonymously
- Full/TPC rates are intended to recover the full cost of healthcare services provided
- Normally the highest UBO rate
- These rates are used for billing commercial insurance carriers and pay patients
 - Exception for DoD civilians overseas
 - Exception for cosmetic procedures
- Most UBO ambulatory/professional services Third Party Collection (TPC) rates are set to match TRICARE reimbursement (CMAC rates)
- Inpatient TPC rates are indexed to TRICARE percent (for the past four years, and are set to recover the full cost of inpatient care including professional services)
- Dental, Ambulance, Ambulatory Procedure Visit (APV), and a few Injectables TPC rates are set based on average Medical Expenses and Performance Reporting System (MEPRS) unit costs with adjustments for cost not reflected in MEPRS expenses



- Interagency rates begin with the full/TPC rates and are discounted to remove several cost factors for health care services
- Items such as durable medical equipment and pharmaceuticals, both retail pharmacy and clinician administered, are not discounted
- Costs removed from interagency charges include
 - Asset Use Charge A charge applied by DoD for the use of its assets (facilities and/or equipment) to recoup depreciation and interest on investment
 - Government Share of Unfunded Retirement Costs A charge applied by
 DoD to cover the cost of the unfunded civilian retirement, post retirement health benefits, and post retirement life insurance

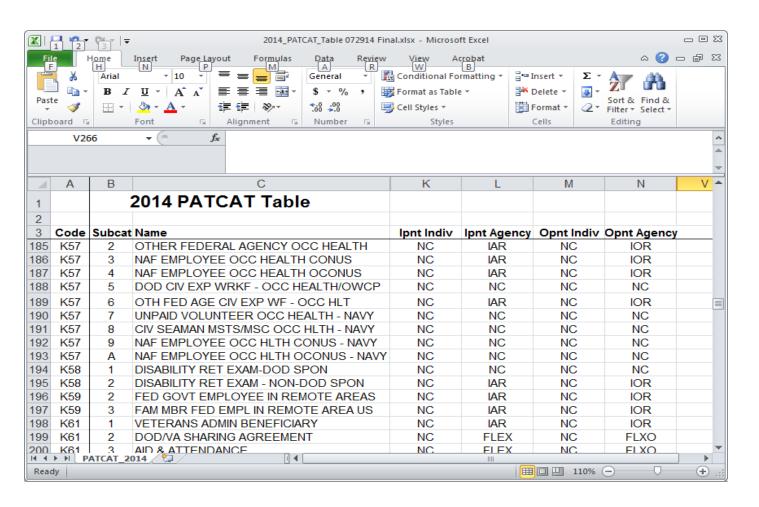


International Military Education and Training Rates

- The IMET Program is a key funding component of U.S. security assistance that provides training on a grant basis to students from allied and friendly nations
 - Authority for the IMET program is found in Chapter 5, part II, Foreign
 Assistance Act of 1961
 - Funding is appropriated from the International Affairs budget of the Department of State
 - Not all foreign national patients participate in the IMET program
- IMET rates remove the same cost components as Interagency rates as well as military personnel cost



 The patient category (PATCAT) assignment is the key to determining whether there should be billing for a patient and, if so, who should be billed and under which rate structure





Reviewing Charging Concepts For DoD-VA Resource Sharing And Available Estimators and Billing Guides

Billing for Veterans Affairs Patients



- DoD-VA Resource Sharing Agreements are very common, but not every MTF has an agreement
- The appropriate billing methodology for Veterans Affairs patients is dependent on the PATCAT assignment
- K61-1 is appropriate when the DoD treatment facility does not have a resource sharing agreement with VA
 - Normal UBO interagency charges apply
- K61-2 is appropriate when the DoD treatment facility does have a sharing agreement with VA
 - DoD-VA Resource Sharing National Agreement charges apply unless modified by local agreement
- There are additional PATCAT selections for VA patients for use in special cases
 - Primarily used at the James A. Lovell Federal Healthcare Center



- The Department of Veterans Affairs is DoD's largest payer
 - Payments
 - o \$105, 659, 921 paid in FY13
 - United States Coast Guard paid \$80,000,000 in FY13
- Charges for health care services to VA beneficiaries under resource sharing agreements are governed by national agreements signed by the Assistant Secretary of Defense for Health Affairs and the Under Secretary for Health Department of Veterans Affairs
 - Inpatient
 - Outpatient
 - Pharmacy
 - Ancillary
- Current reimbursement model began in the first quarter of FY2003.
- In general, these national agreements call for charging at the level TRICARE will allow minus 10%
- National Agreements are available on the DHA UBO Website
 - http://www.tricare.mil/ocfo/mcfs/ubo/billing.cfm



DoD VA Sharing Reimbursement Methodology

- VA/DoD Health Executive Council Memorandum of Agreement Health Care Resource Sharing Reimbursement Methodology
 - Establishes the reimbursement methodology for direct sharing of healthcare resources between facilities of the VA and DoD
 - Both the VA and DoD will use CHAMPUS Maximum Allowable Charge (CMAC) rates less 10% as the reimbursement methodology for health care reimbursement between medical facilities, for institutional and professional charges
- Although waivers are generally discouraged, there are two scenarios under which a waiver from the standardized rate may be requested
 - If the standardized rate does not cover marginal costs
 - If the standardized rate is higher than local market rates and both parties desire a larger discount from CMAC



DoD VA Sharing Inpatient Reimbursement Guidance

- Memorandum to the Surgeons General Department of Veterans Affairs (VA)-Department of Defense (DoD) Health Care Resource Sharing Rates-Billing Guidance Inpatient Services
 - Provides guidance on inpatient billing rates to be used for VA and DoD direct sharing agreements
- VA and DoD have agreed to a reimbursement methodology for billing of inpatient care which uses two components
 - Institutional VA DoD reimbursement for a DRG will use the basic TRICARE DRG payment approach, applying a 10 % discount
 - Professional Services and items NOT included in the DRG basic rate for the hospitalization will be billed separately
 - Professional services to include rounds, inpatient surgeries, and other inpatient procedures (e.g., reading an EKG) will be reimbursed at CMAC less 10%
 - Anesthesia professional services for each pre-intra-post anesthesia episode, including any anesthesia medical direction or supervision, will be reimbursed at CMAC less 10%
- Reimbursement level may be modified by local agreement



Comparison of Adjusted Standardized Amount Rates

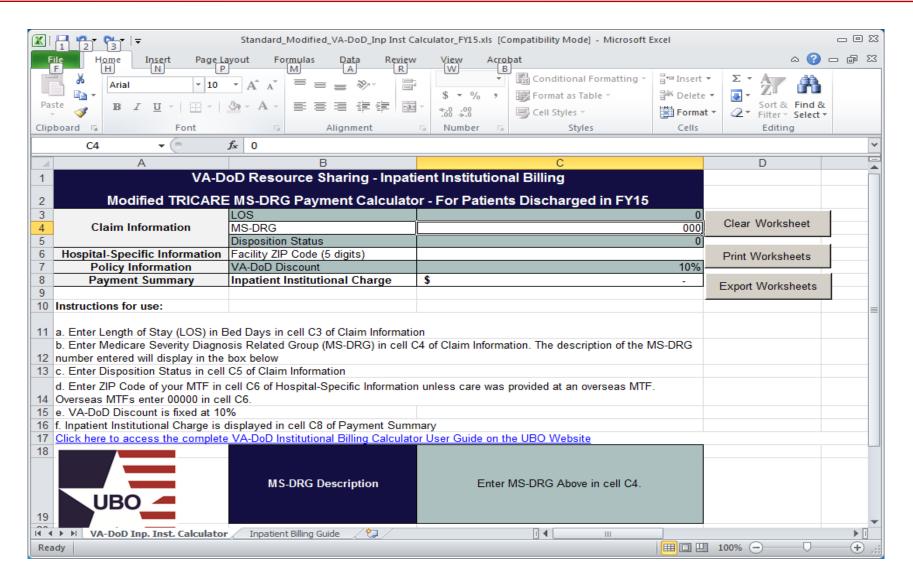
- The inpatient institutional reimbursement under DoD-VA Sharing is significantly lower than the inpatient institutional charging to Full/ TPC payers
- Although the Diagnosis Related Group (DRG) assignments and case weights are consistent, the adjusted standardized amounts (ASAs) or charge per relative weighted product vary significantly

Rate Structure	IMET	Interagency	Full/TPC	DoD-VA Sharing
High Wage Index	\$7,184.50	\$10,851.33	\$11,448.97	\$5,780.77
Low Wage Index	\$7,559.03	\$11,199.19	\$11,856.01	\$5,780.77
Overseas	\$7,450.05	\$15,514.27	\$16,289.65	

 To recover the cost of care provided to VA beneficiaries, it is necessary to bill for professional services in addition to the institutional DRG charge

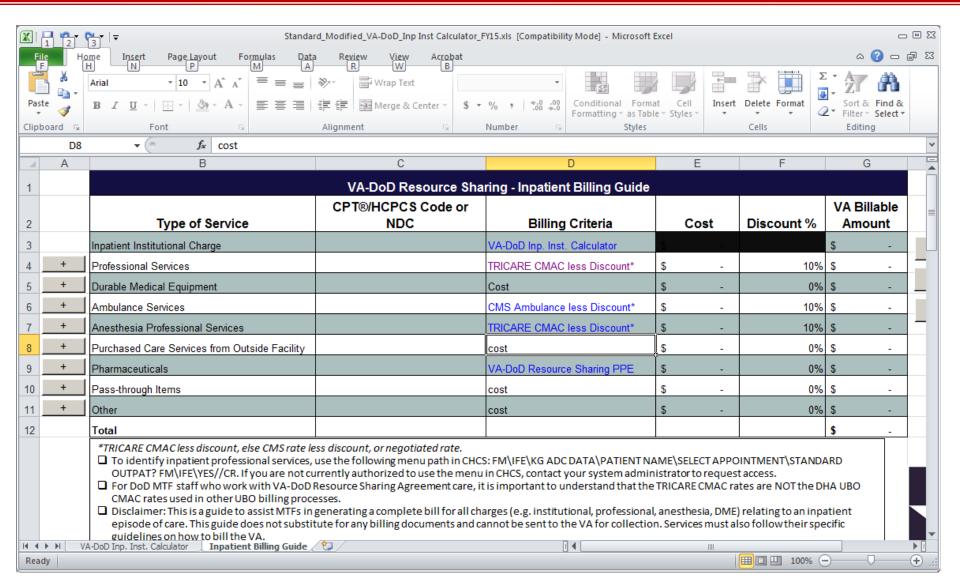


Billing for Inpatient Services Under DoD VA Sharing – Institutional Charge





Billing for Inpatient Services Under DoD VA Sharing- Professional and Other Charges





DoD VA Sharing Outpatient Reimbursement Guidance

- Outpatient billing guidance based on 2003 Memorandum of Agreement
- DoD and VA will bill:
 - Outpatient clinical services provided under direct sharing agreements at TRICARE CMAC minus 10%
 - Non-facility rates for outpatient visits
 - Facility rates for same day surgery procedures
 - Physical and occupational therapy services at CMAC minus 10%
 - Laboratory and radiology at TRICARE CMAC minus 10%
- DoD and VA agreed to use average wholesale price less 60% with a \$9.00 dispensing fee for pharmaceuticals
 - Not applicable to sharing agreements wherein VA participates as part of the TRICARE Retail Pharmacy



DoD VA Sharing Professional Services Billing – TRICARE Provider Categories

TRICARE CHAMPUS Maximum Allowable Charge (CMAC) rates are the basis of DoD VA billing rates for most professional and laboratory procedures. Charges are dependent on site of service and type of provider

- Category 1 Services of MDs, DOs, optometrists, podiatrists, psychologists, oral surgeons, audiologists, and certified nurse midwives (CNMs) provided in a facility including hospitals (both inpatient and outpatient care), ambulances, ASCs, etc
- Category 2 Services of MDs, DOs, optometrists, podiatrists, psychologists, oral surgeons, audiologists, and CNMs provided in a non-facility including provider offices and other non-facility settings
 - The non-facility CMAC rate applies to Occupational Therapy (OT), Physical Therapy (PT), or
 Speech Therapy (ST) regardless of the setting
- Category 3 Services, of all other providers not found in Category 1, provided in a facility including hospitals (both inpatient and outpatient care), ambulances, ASCs, etc
- Category 4 Services, of all other providers not found in Category 2, provided in a non-facility including provider offices and other non-facility settings



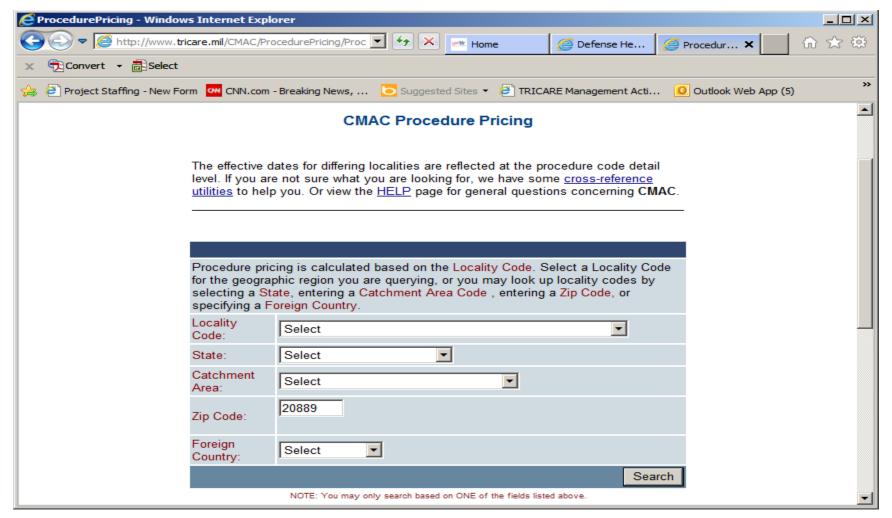
General Guidance for Determining Professional Services Categories (DoD VA Sharing)

- Use the facility TRICARE CMAC rates, Categories 1 and 3, when there is a separate institutional charge for the patient encounter
 - DRG Charge
 - APV Charge
- Use the non-facility TRICARE CMAC rates, Categories 2 and 4, when there is no separate charge for the patient encounter
- Always use Category 2 for Occupational, Physical, and Speech Therapy
- Radiology procedures will typically not have different facility and non-facility rates
- Many lab procedures may only have one rate



More on Billing Outpatient Services (DoD VA Sharing)

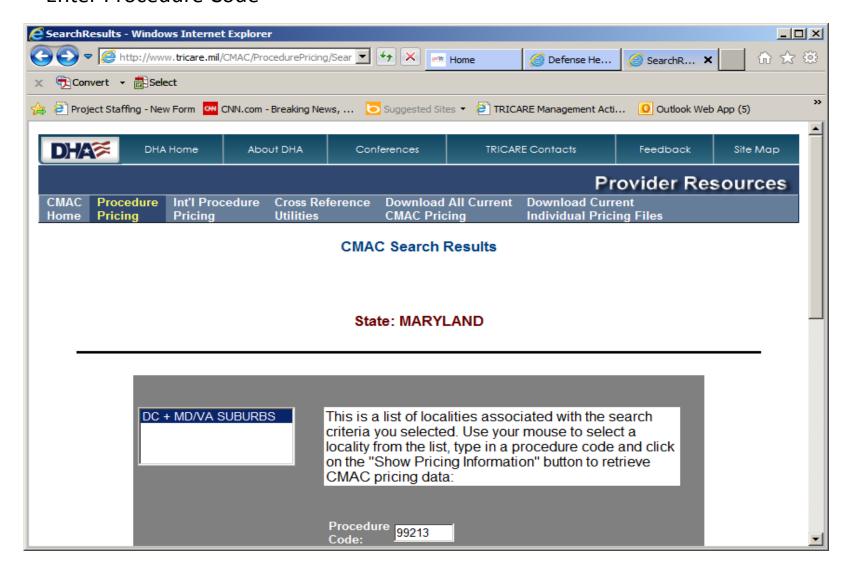
On the TRICARE website, enter zip code or CMAC locality code





Outpatient / Professional Services Billing (DoD VA Sharing)

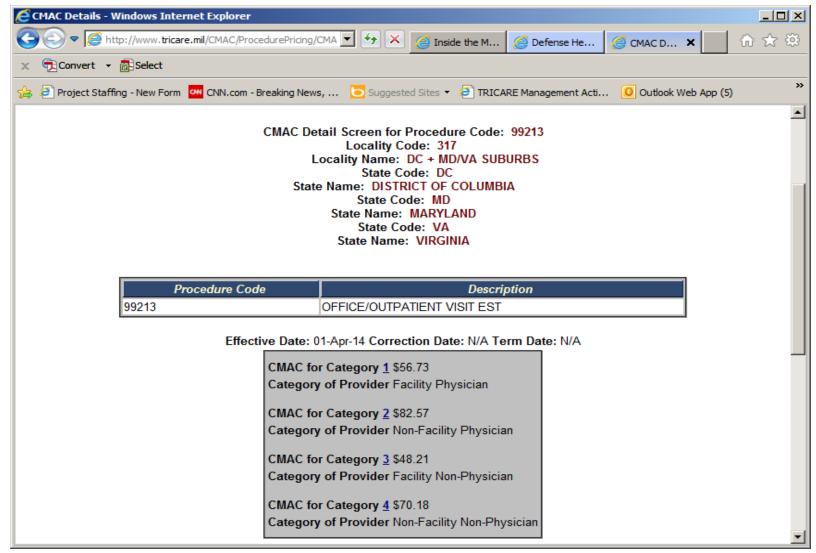
Enter Procedure Code







Use Appropriate Category Rate – Remember to discount 10%





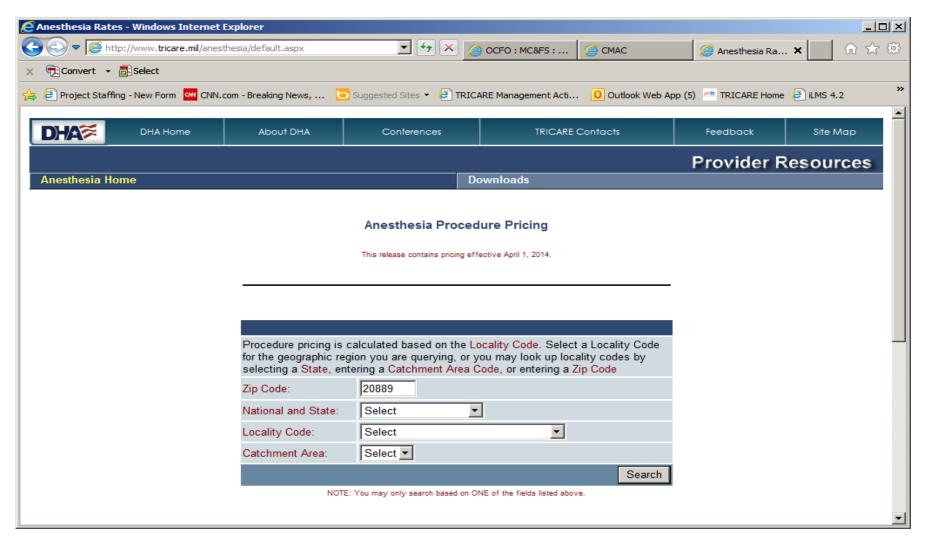
More on Billing for Anesthesia Services Under DoD VA Sharing

- Under National Agreement, DoD bills VA at the TRICARE allowable amount minus 10%
- The anesthesia rate, also called a conversion factor, is charged per anesthesia unit. Each anesthesia procedure has a number of base units that is combined with individual encounter units of service to obtain total units.
- The anesthesia charge recovers the cost of the anesthesia provider's professional services only
- Anesthesia units are professional time units; they are not related to any pharmaceuticals or other supplies used during the procedures
 - The cost of pharmaceuticals and supplies as well as the operating room and nursing staff is recovered through other institutional billing
 - Ambulatory Procedure Visit charge
 - Diagnosis Related Group charge
 - Possible Ambulatory Payment Classification or Ambulatory Surgery Center charges in the future



Billing for Anesthesia Services Under DoD VA Sharing

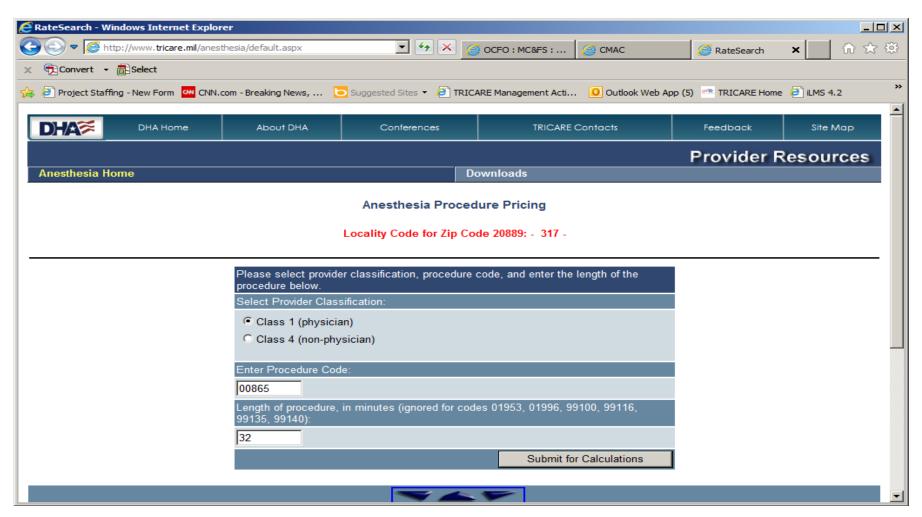
On the TRICARE Website enter your zip code or CMAC locality code





Billing for Anesthesia Services Under DoD VA Sharing - Continued

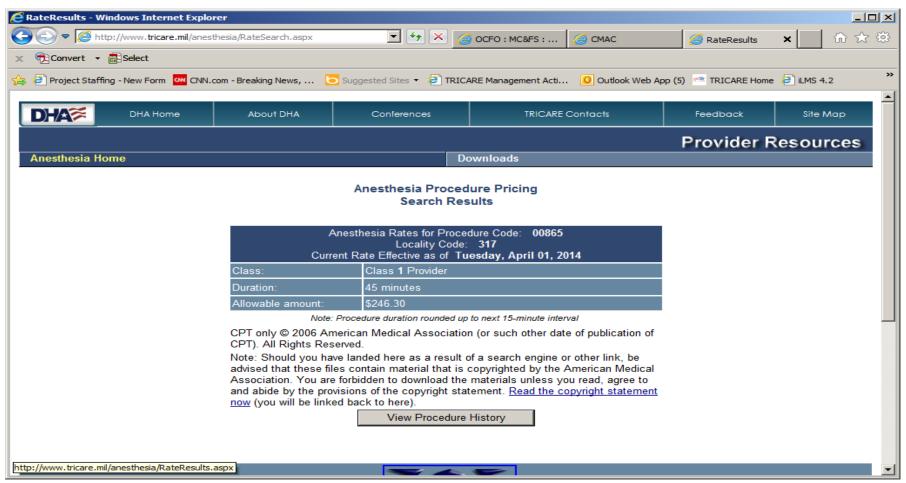
Enter provider class, anesthesia procedure, and minutes of service





Billing for Anesthesia Services Under DoD VA Sharing - Continued

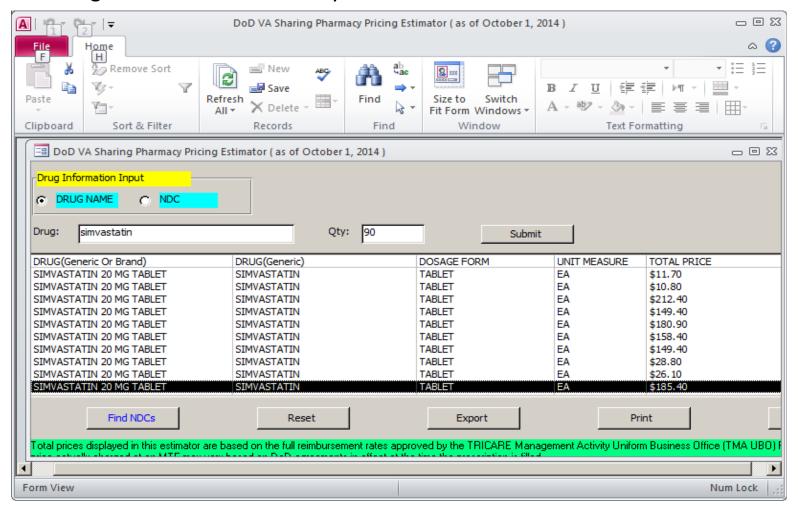
TRICARE reimbursement is \$246.30, the discounted charge under VA sharing (10%) would be \$221.67





Billing for Pharmaceuticals Under DoD - VA Sharing

The UBO Program Office provides a pharmaceutical calculator with DoD – VA Sharing Discounts Automatically Calculated





Learning How To Search For Additional Billing Opportunities



Not all billable encounters will automatically flow to billing solutions



 UBO staff may be able to identify, bill, and collect for additional services

MEPRS Functional Cost Account Codes

A	npatient	Care

- Example Cardiology: AAB
- B Ambulatory Care
 - Example Primary Care Clinic: BHA
- C Dental Care
 - Example Dental Care: CAA
- D Ancillary Services
 - Examples Pharmacy: DAA, Clinical Pathology: DBA, Diagnostic Radiology: DCA, Other Ancillary Services
- E Support Services
 - Example Third Party Collection Administration: EBH
- F Special Programs
 - Example Ambulance Services: FEA
- G Readiness
 - Example Deployment Planning and Administration: GAA



The Role of the CHCS Ambulatory Data Module

- Charges for procedures and services billed by TPOCS, CHCS MSA and Monthly DD7/DD7A are captured as a by-product of day-to-day operations using:
 - CHCS Registration (Mini and Full Registration)
 - CHCS Patient Insurance Information (PII)
 - CHCS Admissions, Discharge, Transfer (ADT)
 - CHCS Ambulatory Data Module (ADM)
 - CHCS Laboratory (LAB)
 - CHCS Radiology (RAD)
 - CHCS Pharmacy (PHR)
- CHCS Ambulatory Data Module (ADM) prepares a daily batch extract ASCII (text) file for each MTF on the CHCS host that contains patient level data for:
 - Ambulatory Clinic Encounters
 - Ambulatory Procedure Visits (APV) Encounters
 - Inpatient Consults (Not associated with the Attending Clinical Service)
 - Inpatient Professional Services Record



Each File is an ASCII formatted file and will be "pushed" to the Third Party Outpatient Collection System (TPOCS) via Composite Healthcare System (CHCS) Electronic Transfer Utility (ETU)

Laboratory/Radiology

Pharmacy

Ambulatory Data Module

Standard Insurance
Table
Provider
Other Health Insurance
CPT/HCPCS

Ambulatory Data Module Message
Definition/Field 23 - ADM will only send "B"
Level MEPRS Code and "FBI*" Immunization
Clinic encounters



- Electrocardiography (EKG): DDA
- Electroencephalography (EEG): DDB
- Electroneuromyography (EMG): DDC
- Pulmonary Function: DDD
- Cardiac Catheterization: DDE
- Anesthesiology: DFA
- Hemodialysis: DGB
- Peritoneal Dialysis: DGD
- Inhalation and Respiratory Therapy: DHA
- Nuclear Medicine Clinic: DIA

Additional Billing Opportunities



- Outpatient care (all UBO healthcare cost recovery programs and DoD VA resource sharing)
 - Billing office staff may bill for all coded ambulance, nonpharmacy, laboratory, radiology ancillary services even if they do not automatically flow to TPOCS
 - Billing office staff will need to query CHCS ADM for billable patients to identify
- Inpatient care (excludes DoD VA resource sharing)
 - UBO adjusted standardized amount rates include both institutional and professional component



Assessing How The Patient Protection and Affordable Care Act (PPACA) Might Affect MTFs





The Affordable Care Act - Preventive Services

- All Marketplace plans and many other plans must cover certain preventive services without charging the patient a copayment even if the deductible has not been met
- This applies only when these services are delivered by a network provider
- This could provide additional revenue for MTFs as copayments and deductible amounts are not charged to MHS beneficiaries

ACA Preventive Health Services for Adults

- Abdominal Aortic Aneurysm one-time screening for men of specified ages who have ever smoked
- Alcohol Misuse screening and counseling
- Aspirin use to prevent cardiovascular disease for men and women of certain ages
- Blood Pressure screening for all adults
- Cholesterol screening for adults of certain ages or at higher risk
- Colorectal Cancer screening for adults over 50
- Depression screening for adults
- Diabetes (Type 2) screening or adults with high blood pressure
- Diet counseling for adults at higher risk for chronic disease
- HIV screening for everyone ages 15 to 65, and other ages at increased risk
- Immunization vaccines for adults--doses, recommended ages, and recommended populations vary:
 - Hepatitis A, Hepatitis B
 - Herpes Zoster
 - Human Papillomavirus
 - Influenza (Flu Shot)
 - Measles, Mumps, Rubella
 - Meningococcal
 - Pneumococcal
 - Tetanus, Diphtheria, Pertussis
 - Varicella
- Obesity screening and counseling for all adults
- Sexually Transmitted Infection (STI) prevention counseling for adults at higher risk
- Syphilis screening for all adults at higher risk
- Tobacco Use screening for all adults and cessation interventions for tobacco users

ACA Preventive Health Services for Women

- Anemia screening on a routine basis for pregnant women
- Breast Cancer Genetic Test Counseling (BRCA) for women at higher risk for breast cancer
- Breast Cancer Mammography screenings for women over 40
- Breast Cancer Chemoprevention counseling for women at higher risk
- Breastfeeding comprehensive support and counseling and access to breastfeeding supplies, for pregnant and nursing women
- Cervical Cancer screening for sexually active women
- Chlamydia Infection screening for younger women and other women at higher risk
- Contraception: Food and Drug Administration-approved contraceptive methods, sterilization procedures; This
 does not apply to health plans sponsored by certain exempt "religious employers"
- Domestic and interpersonal violence screening and counseling for all women
- Folic Acid supplements for women who may become pregnant
- Gestational diabetes screening for women 24 to 28 weeks pregnant and those at high risk of developing gestational diabetes
- Gonorrhea screening for all women at higher risk
- Hepatitis B screening for pregnant women at their first prenatal visit
- HIV screening and counseling for sexually active women
- Human Papillomavirus (HPV) DNA Test every 3 years for women with normal cytology results who are 30 or older
- Osteoporosis screening for women over age 60 depending on risk factors
- Rh Incompatibility screening for all pregnant women and follow-up testing for women at higher risk
- Sexually Transmitted Infections counseling for sexually active women
- Syphilis screening for all pregnant women or other women at increased risk
- Tobacco Use screening and interventions for all women, and expanded counseling for pregnant tobacco users
- Urinary tract or other infection screening for pregnant women
- Well-woman visits to get recommended services for women under 65

ACA Preventive Health Services for Children

- Alcohol and Drug Use assessments for adolescents
- Autism screening for children at 18 and 24 months
- Behavioral assessments
- Blood Pressure screening
- Cervical Dysplasia screening for sexually active females
- Depression screening for adolescents
- Developmental screening for children under age 3
- Dyslipidemia screening for children at higher risk of lipid disorders
- Fluoride Chemoprevention supplements for children without fluoride in their water source
- Gonorrhea preventive medication for the eyes of all newborns
- Hearing screening for all newborns
- Height, Weight and Body Mass Index measurements
- Hematocrit or Hemoglobin screening
- Hemoglobinopathies or sickle cell screening for newborns
- HIV screening for adolescents at higher risk
- Hypothyroidism screening for newborns
- Immunization vaccines for children from birth to age 18
- Iron supplements for children ages 6 to 12 months at risk for anemia
- Lead screening for children at risk of exposure
- Medical History for all children throughout development
- Obesity screening and counseling
- Oral Health risk assessment
- Phenylketonuria (PKU) screening for this genetic disorder in newborns
- Sexually Transmitted Infection (STI) prevention counseling and screening for adolescents at higher risk
- Tuberculin testing for children at higher risk of tuberculosis and Vision Screening



Limitation on Coverage for Preventive Services Without Patient Copayment

- General limitation on ACA plan coverage without application of copayment or deductible requirements – Services must be delivered by a network provider
- However, under statute this may not be used to reduce third party payment
- 32 CFR §220.3 Statutory obligation of third party payer to pay
 - (a) Statutory requirement. Under 10 U.S.C. 1095(b), no provision of any third party payer's plan having the effect of excluding from coverage or limiting payment for certain care if that care is provided in a facility of the uniformed services shall operate to prevent collection by the United States.
 - (b) General rules. Based on the statutory requirement, the following are general rules for the administration of 10 U.S.C. 1095 and this part
 - (4) No objection, precondition or limitation may be asserted that is contrary to the basic nature of facilities of the uniformed services
 - (c) Specific examples of impermissible exclusion
 - (4) No participation agreement. The lack of a **participation agreement** or the absence of privity of contract between a third party payer and a facility of the uniformed services **is not a permissible ground for refusing or reducing third party payment**

Regulatory Foundations For Payment

32 CFR §220.4 Reasonable terms and conditions of health plan permissible

- (d) *Procedures for establishing reasonable terms and conditions.* In order to establish that a term or condition of a third party payer's plan is permissible, the *third party payer must provide appropriate documentation* to the facility of the Uniformed Services.
- This includes, when applicable, copies of explanation of benefits (EOBs), remittance advice, or payment to provider forms.
- It also includes copies of policies, employee certificates, booklets, or handbooks, or other documentation detailing the plan's health care benefits, exclusions, limitations, deductibles, co-insurance, and other pertinent policy or plan coverage benefit information.

REQUEST THIS INFORMATION FROM PAYERS TO ENSURE THE MTF AND THE PAYER ARE MEETING THE REQUIREMENTS OF THE PLAN INCLUDING COVERAGE OF APPROPRIATE SERVICES WITHOUT APPLICATION OF COPAYMENTS AND DEDUCTIBLES



Reducing Lost Revenue from Pharmaceuticals Requiring Pre-Authorization



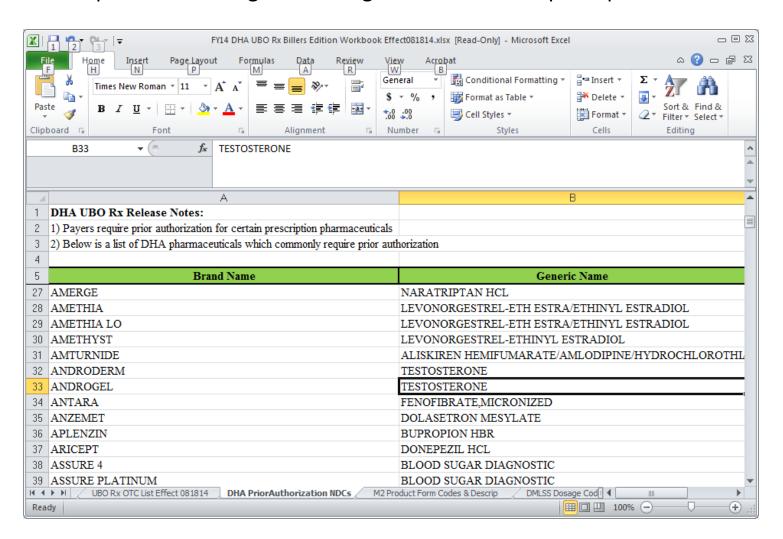


- Prior Authorization is a cost-savings feature of pharmacy benefit plans that are intended to help ensure the appropriate use of selected prescription drugs
 - encourages safe and cost-effective medication use; generally applies to certain high-cost drugs that have the potential for misuse.
 - Drugs needing prior authorization may:
 - Have dangerous side effects or can be harmful when combined with other drugs
 - Be used only for certain health conditions
 - Be often misused or abused
 - Be prescribed when less expensive drugs might work better
- The provider must provide documentation to meet the payer's criteria for that particular medication
- The list of drugs requiring prior authorization differs by payer



The Pharmacy Rate File Billers Addition

The Formulary and OTC Unit Rates – Biller's Edition available on the DHA UBO Website provides a listing of the drugs that TRICARE requires prior authorization





- If you receive a denial due to a lack of prior authorization:
 - Verify that the pharmaceutical is on the payer's list of drugs requiring prior authorizations
 - Contact the payer if necessary to determine what information they require to review the prescription
 - Consult with your billing office manager to determine if contacting the prescribing provider to provide the required information is feasible





Questions?

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