

Billing for Pharmacist Services in the Oncology Setting

Anay Moscu, PharmD, BCPS, BCOP, ACRP-CP

Pharmacy Director – Outpatient Infusion Pharmacy



Key Abbreviations

AWV: Annual Wellness Visits

CCM: Chronic care management

DSMT: Diabetes Self-Management Training

MTM: Medication Therapy Management

TCM: Transitional Care Management



Pharmacist Billing

Pharmacist Provider Status

- Medicare does not consider Pharmacist's providers under Part B (auxiliary staff)
- Medicaid state plans defined by state legislation/regulations
- Commercial plans defined by the plan

Pharmacists can bill for medication management services

- Prescription benefits (Medicare Part D): using their NPI through MTM
- Medical benefits (Medicare Part B): under a provider NPI through "incident to" billing for E/M, CCM, TCM (bundled payment), AWV, and DSMT

Physician-Based Outpatient Clinic

- Professional Fee

Hospital-Based Outpatient Clinic

- Professional Fee + Facility Fee



Evaluation and Management (E/M) Codes

- **Three components:**

- Evaluation of history, physical exam, and medical decision making
- Nature of presenting problem, counseling, and care coordination
- Time

- **Pharmacist application:**

- Disease management: diabetes, HTN, dyslipidemia, COPD, asthma, smoking cessation
- Oncology Supportive care management: N/V, diarrhea, pain, immune-related toxicities
 - Role of APP (G3 and higher)

Outpatient E/M codes:

- New patient codes: 99201, 99202, 99203, 99204, 99205 (per Medicare physician only)
- Established patient codes: 99211, 99212, 99213, 99214, 99215



Evaluation and Management (E/M) Codes

Physician-Based Outpatient Clinic

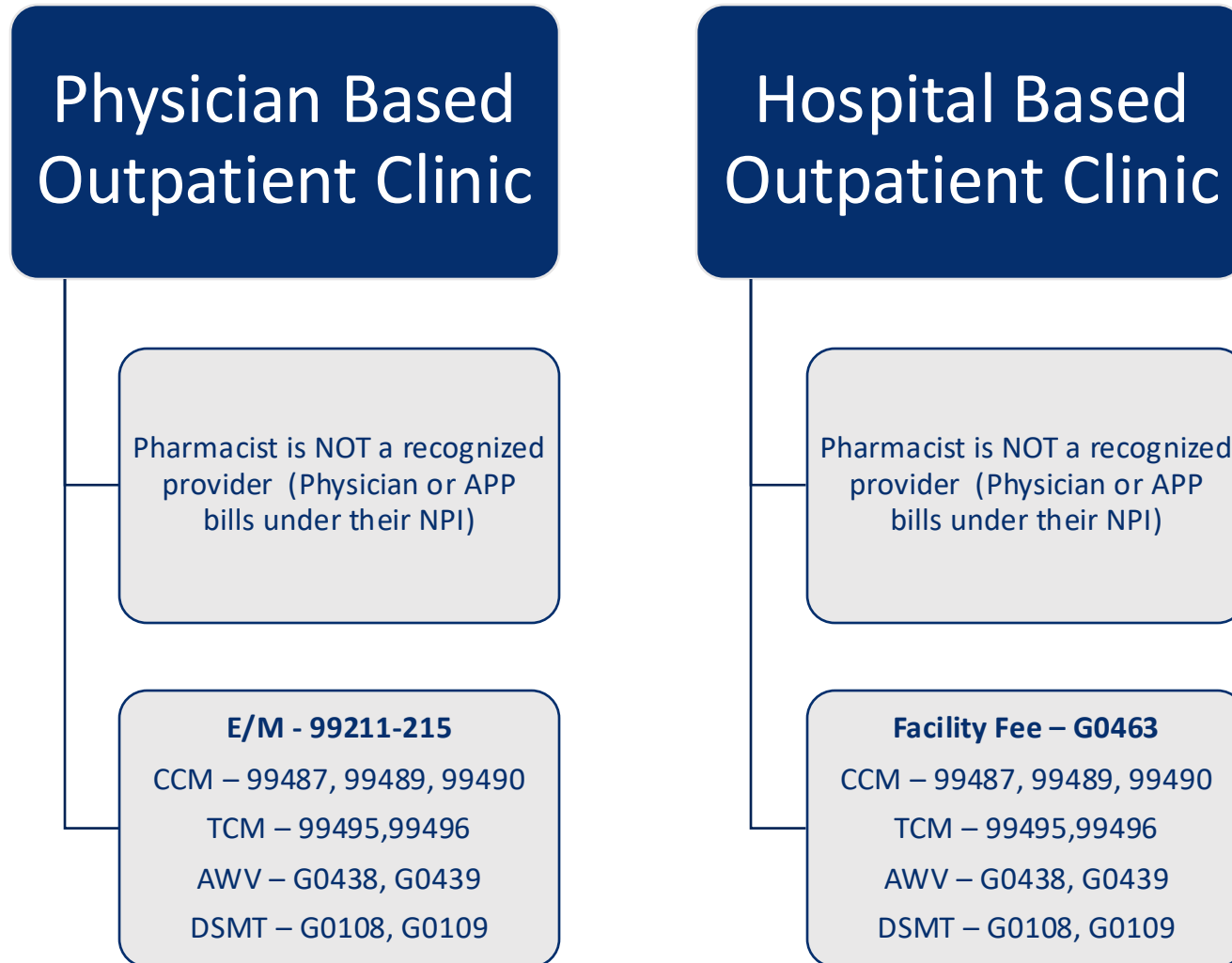
- Professional Fee
- Pharmacist Provider: 99211-99215
- Pharmacist not a provider: Level 1 99211 ONLY ~ \$23 (higher codes under provider NPI) or “incident to” for higher codes

Hospital-Based Outpatient Clinic

- Professional Fee + Facility Fee
- G0463 Collapsed Code Facility Fee ~ \$125
 - Commercial payers may not pay facility fees and require pharmacist bill 99211
 - **Key Point:** Negotiate reimbursement rates as part of contracting for pharmacist services



Evaluation and Management (E/M) Codes





Getting Started

1. Assess if your current outpatient pharmacy practice is eligible for billing.
 - Medication management: This must be within their scope of practice and should be done through an approved clinic protocol or collaborative pharmacy practice agreement (465.1865).
2. Understand your institutional needs and appetite for pharmacists to perform these services.
 - Providers and Clinic Administration
 - ↑ provider visits, billing under provider NPI, ↑ RVU's
3. Once you define a potential practice model, meet with the following key stakeholders:
 - Legal
 - Compliance
 - Revenue Cycle
 - Billing/Coding
 - IT
4. Set up services and meet with payor contracting.
5. Track and measure.



References

1. Centers for Medicare and Medicaid Services. Medicare Learning Network, Evaluation and Management Services. September 2024. <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/eval-mgmt-serv-guide-ICN006764.pdf>. Accessed November 4, 2024.
2. American Society of Health-System Pharmacists Section of Ambulatory Care Practitioners. (2014) Pharmacist Billing for Ambulatory Pharmacy Patient Care Services in a Physician-Based Clinic and Other Non-Hospital-Based Environments – FAQ [Fact Sheet]. ASHP. <https://www.ashp.org/-/media/assets/ambulatory-care-practitioner/docs/sacp-pharmacist-billing-for-ambulatory-pharmacy-patient-care-services.pdf>
3. American Society of Health-System Pharmacists Section of Ambulatory Care Practitioners. (2021) Facility Fee Billing – FAQ [Fact Sheet]. ASHP. <https://www.ashp.org/pharmacy-practice/resource-centers/ambulatory-care/compensation-and-sustainable-business-models> Accessed November 4, 2024.
4. American Pharmacists Association. Billing Primer: A pharmacist’s Guide to Outpatient Fee-For-Service Billing. Washington, DC: American Pharmacist Association; August 2019.
5. Dietrich E, Gums JG. Incident-to Billing for Pharmacists. J Manag Care Spec Pharm. 2018 Dec;24(12):1273-1276. doi: 10.18553/jmcp.2018.24.12.1273. PMID: 30479200; PMCID: PMC10397947.
6. American Society of Health-System Pharmacists Section of Ambulatory Care Practitioners. (2019) Pharmacist Billing/Coding Quick Reference Sheet For Services Provided in Physician-Based Clinics [Fact Sheet]. ASHP. <https://www.ashp.org/-/media/assets/pharmacy-practice/resource-centers/ambulatory-care/billing-quick-reference-sheet.ashx?la=en&hash=8074CF55F7B84C0741CD0E73A64F47CB22CFF4AE>
7. Centers for Medicare and Medicaid Services. Physician Fee Schedule: Overview. <https://www.cms.gov/apps/physician-fee-schedule/overview.aspx> Updated October 1, 2024. Accessed November 4, 2024.