



CHRONIC CARE MANAGEMENT TOOL KIT

What Practices Need to Do to Implement and Bill CCM Codes

Understanding CCM

Chronic Care Management (CCM) is defined as the non-face-to-face services provided to Medicare beneficiaries who have multiple (two or more), significant chronic conditions. In addition to office visits and other face-to-face encounters (billed separately), these services include communication with the patient and other treating health professionals for care coordination (both electronically and by phone), medication management, and being accessible 24 hours a day to patients and any care providers (physicians or other clinical staff). The creation and revision of electronic care plans is also a key component of CCM.

- The designated CCM clinician (MD, PA, NP) must establish, implement, revise, or monitor and manage an electronic care plan that addresses the physical, mental, cognitive, psychosocial, functional and environmental needs of the patient as well as maintain an inventory of resources and supports that the patient needs. Thus, the practice must use a certified EHR to bill CCM codes.
- Only one clinician can bill for any particular patient therefore it may be necessary to coordinate with the sub-specialists who may be providing a significant amount of care and treatment to one or more of the patient's conditions. It will be important that the patients understand only one of their likely multiple physicians will be able to bill for CCM services.

These codes are generally intended for use by the clinician who is providing the majority of the care coordination services, which most often would be the primary care internist. However, certain specialists may be able to provide the services needed to qualify to bill the CCM codes, *but never in the same month as the primary care physician.*

Definitions:

- Eligible professional (EP) – The CCM codes can only be billed by a physician, advanced practice registered nurse, clinical nurse specialist, or physician assistant.
- Chronic condition – CPT states that patients must have “2 chronic continuous or episodic health conditions that are expected to last at least 12 months, or until the death of the patient, and that place the patient at significant risk of death, acute exacerbation/decompensation, or functional decline.” CMS did not provide guidance as to what diagnoses would meet this definition.

- Comprehensive Care Plan – This is an electronic summary of the physical, mental, cognitive, psychosocial, functional, and environmental assessments, a record of all recommended preventive care services, medication reconciliation with review of adherence and potential interactions and oversight of patient self-management of medications, an inventory of clinicians, resources, and supports specific to the patients, including how the services of agencies or specialists unconnected to the designated physician’s practice will be coordinated. Including assurance of care appropriate for patient’s choices and values.
- **Clinical staff – Licensed clinical staff members (including APRN, PA, RN, LCSW, LPN and “medical technical assistants” or CMAs) who are directly employed by the clinician (or the clinician’s practice) or a contracted third party and whose CCM services are generally supervised by the clinician, whether provided during or after hours. Thus the “incident to” rules do not necessarily require that the clinician be on the premises providing direct supervision.**
- Contact-based care – To count the time towards the 20-minutes of non-face-to-face time, the care must be “contact initiated.” This could be patient-doctor, doctor-doctor, pharmacy-doctor, lab-doctor, or other contact regarding or by the patient via phone or electronic communication. General planning time or care coordination doesn’t count unless it is initiated based on a contact and/or results in a patient or patient-related contact. For example, if the pharmacist calls the office because the patient reported a rash, then the time counts. If the office spends time running a report of all participants due for a flu shot or an A1C check, that time doesn’t count. When they call and speak to the patient and then coordinate care, then that time would count. In-person visits, including group visits, do not count toward CCM codes.
- Certified CCM technology – For 2015, CCM codes must be provided by a certified EHR that satisfies either the 2011 or 2014 edition of the certification criteria for the EHR Incentive Programs with the following core technology capabilities:
 - Structured recording of demographics, problems, medications, and medication allergies and
 - Creation of a summary of care record that can be maintained and accessed at any time.
- **Billing:**
 - CPT code 99490 – The 2015 average reimbursement is \$42.60 adjusted based on geography.
 - The practice must have the patient’s **written** consent in order to bill for CCM services (see Attachment 2).
 - Only one clinician can furnish and be paid for CCM services during a calendar month. The clinician who is providing the primary care to the patient is the one who can bill. Usually this will be the primary care internist, but some specialists may be serving as the patient’s primary care physician.
 - Copayments (coinsurance and deductibles) DO apply.
 - The following codes cannot be billed during the same month as CCM (CPT 99490):
 - Transition Care Management (TCM) – CPT 99495 and 99496
 - Home Healthcare Supervision – HCPCS G0181
 - Hospice Care Supervision – HCPCS G9182
 - Certain ESRD services – CPT 90951-90970
 - If other E&M or procedural services are provided, those services will be billed as appropriate. That time can NOT be counted toward the 20 minutes. If time, such as from a phone call, leads to an office

visit resulting in an E&M charge, that time would be included in the billed office visit, NOT the CCM time.

Documentation:

- Document patient consent, if they declined to participate, or indicated participation elsewhere (and if so, with whom).
- Document 20 minutes of non-face-to-face clinical staff time. Each practice will need to develop its own consistent system of documentation based on its unique physical, staffing, and EHR configuration. Consideration should include documentation of care provided by both internal and external (such as for call coverage) individuals, who and how care will be documented in the record, and how to document time spent doing different aspects of care and care coordination. It is quite possible that there will not be a CCM code billed for every patient every month, some months may not generate 20 minutes of care coordination.
- If after hours care is provided by a clinician who is not part of the practice, such as for call coverage, that individual must have access to the electronic care plan (other than by facsimile). The care plan may be accessed via a secure portal, a hospital platform, a web-based care management application, a health information exchange, or an EHR to EHR interface.
- Services can be provided “incident-to” the designated clinician if the CCM services are provided by licensed clinical staff employed by the clinician or practice who are under the general, not necessarily the direct, supervision of the designated clinician. The normal “incident-to” documentation requirements apply.
- Contracted clinicians, such as covering clinicians or locum tenens, count as long as they have access 24/7 to the patient’s electronic record and are under the general supervision of the CCM physician or “eligible practitioner.”

How to Implement CCM Codes

Step 1: Identify the patients

- Use your EHR to search for patients that have 2 or more chronic conditions.
- The patient must have 2 or more chronic conditions that have the following required elements:
 - Multiple (2 or more) chronic conditions that are expected to last at least 12 months or until death; and
 - Place the patient at significant risk of death, acute exacerbation/decompensation, or functional decline.
- Initially, you may wish to focus on a small number of specific diagnoses.
- Create a log of participating CCM patients [Attachment 1]

Step 2: Designate a primary clinician. Name: _____

- Patient should be able to access “successive routine appointments” with the designated clinician.
- Other staff can provide services “incident to” the primary clinician, as long as the primary provide is providing general supervision.

Step 3: Add patient to the CCM log.

Step 4: Inform the Patient

- Obtain patient’s written consent to participate. [Attachment 2]
 - Explain how it works and that they can decline, transfer, or terminate at any time
 - Provide information on how to terminate or transfer
 - Authorization of electronic communication of medical information with other clinicians (as allowed by state and local rules and regulations)
 - Provides designated physician’s name
 - Explains how and when the bills will be generated and what the patient’s obligations are for payment of coinsurance and deductibles.
- Review participation agreement with patients and validate their understanding
- Record in the electronic chart that CCM was explained and written consent obtained to accept or decline services, from whom (name of clinician), receive electronic care plan, and of the right to stop CCM services at any time.

Step 5: Create and Document a Comprehensive Care Plan

- Care management for chronic conditions should include:
 - A systematic assessment of the patient’s medical, functional, and psychosocial needs;
 - System-based approaches to ensure timely receipt of all recommended preventive care services;
 - Medication reconciliation with review of adherence and potential interactions; and
 - Oversight of beneficiary self-management of medications.
- Create a patient-centered care plan based on a physical, mental, cognitive, psychosocial, functional and environmental (re)assessment and an inventory of resources and supports.

- As appropriate, share the Comprehensive Care Plan with other clinicians and providers.

Step 6: Provide the patient with the written or electronic copy of the comprehensive care plan.

Step 7: Document the Time Spent (see “Documentation” on p. 2)

- Set up a system that can keep track of time spent on non-face-to-face services provided, including:
 - phone calls and email with patient;
 - time spent coordinating care (by phone or other electronic communication) with other clinicians, facilities, community resources, and caregivers; and
 - time spent on prescription management/medication reconciliation.

Step 8: Termination from program [Attachment 3]

- Document death, transfer of patient to another clinician, or termination from the CCM plan for any reason (e.g., non-payment of copays? Patient wants another physician to be in charge of their CCM such as the oncologist or cardiologist or rheumatologist or whatever specialist might apply to the more intensive chronic condition?)

ATTACHMENT 1

Sample Log of CCM Patients

Patient Name	Primary Clinician	Date Enrolled	Care Plan Review Date	Date Terminated	Notes

ATTACHMENT 2

Sample Letter to Patients with 2+ Chronic Care Conditions

Dear Patient,

As a patient with two or more chronic conditions (_____ list conditions _____), you may benefit from a new program that [_____ name of practice _____] is now offering all Medicare patients. Our goal is to make sure you get the best care possible from everyone that is involved with your care. We can help coordinate your visits with other doctors, facilities, lab, radiology, or other testing; we can talk to you on the phone about your symptoms; we can help you with the management of your medications; and we will provide you with a comprehensive care plan. Medicare will allow us to bill for these services during any month that we have provided at least 20 minutes of non-face-to-face care of you and your conditions. You must provide your consent to participate once a year.

Your assigned clinician in charge of your care is ____ [insert clinician name] ____ . Sometimes other staff from our practice will talk to you or handle issues related to your care, but please know that your assigned clinician will supervise all care provided by our staff or clinicians who may be involved in your care.

You agree and consent to the following:

- As needed, we will share your health information electronically with others involved in your care. Please rest assured that we continue to comply with all laws related to the privacy and security of your health information.
- We will bill Medicare for this chronic care management for you once a month. The fee for this service allowed by Medicare is ____ [insert allowed fee] ____, of which your portion will be ____ [insert copayment amount] ____ . Although you may or may not come into the office every month, your account will reflect this charge and you will be responsible for payment. Our office will have a record of our time spent managing your care if you ever have a question about what we did each month.
- Only one physician can bill for this service for you. Therefore, if another one of your physicians has offered to provide you with this service, you will have to choose which physician is best able to treat you and all of your conditions. Please let your physician or our staff know if you have entered into a similar agreement with another physician/practice.

You have a right to:

- A comprehensive Care Plan from our practice to help you understand how to care for your conditions so that you can be as healthy as possible.
- Discontinue this service at any time for any reason. Because your signature is required to end your chronic care management services, please ask any of our staff members for the CCM termination form.

Our goal is to provide you with the best care possible, to keep you out of the hospital, and to minimize costs and inconvenience to you due to unnecessary visits to doctors, emergency rooms, labs, or hospitals. We know your time and your health is valuable and we hope that you will consider participation in the program with our practice.

I agree to participate in the Chronic Care Management program. Yes _____ No _____

Patient Signature

Date

ATTACHMENT 3

Sample Chronic Care Management Stop Form

As of [insert last day of current calendar month], I have decided to terminate participation in the Chronic Care Management program. I understand that any services provided in the future regarding any of my conditions will have to be in-person and that I will no longer be charged for the Chronic Care Management codes.

Patient Signature

Date