

**Clinical Practice Guideline: Patient Assessments: Medical Necessity Decision Assist Guideline for Evaluations and Re-evaluations for Dates of Service Prior to January 1, 2021**

**Date of Implementation: January 31, 2008**

**Scope: Specialty**

A variety of Current Procedural Terminology (CPT) codes represent evaluation/re-evaluation services. The choice of the appropriate evaluation/re-evaluation code series is determined by practitioner licensure (Evaluation and Management (E/M) codes (e.g., DC, ND, DPM) or Evaluation and Re-evaluation codes (e.g., PT, OT, AT)).

Appropriate outcome measures (e.g., Oswestry Disability Index, Neck Disability Index, and Visual Analogue Pain Scale) are an integral part of most evaluations and re-evaluations. These tools allow the practitioner to quantify the patient’s clinical and/or functional status, identify prognostic indicators, measure changes in clinical and/or functional status over time, and assess the effectiveness of interventions. Please refer to [www.ashlink.com](http://www.ashlink.com) for additional information on various outcome assessment tools and other ASH Clinical Practice Guidelines.

**EVALUATION AND MANAGEMENT (E/M) CODING OVERVIEW**

For specialties that use E/M codes, a New Patient is defined by the CPT manual as one who has not received any professional services from the physician/qualified health care professional or another physician/qualified health care professional of the exact same specialty and subspecialty who belongs to the same group practice, within the past three years. An Established Patient is defined by the CPT manual as a patient who has received professional services from the physician/qualified health care professional or another physician/qualified health care professional of the exact same specialty and subspecialty who belongs to the same group practice, within the past three years. Practitioners are encouraged to become familiar with the current CPT codes and their use as well as with the applicable American Specialty Health – Specialty (ASH) client summaries.

According to the CPT manual, E/M codes refer to Evaluation and Management services provided during the physician/qualified health care professional-patient face-to-face interaction. The typically used E/M codes are Office or Other Outpatient Services for New Patients: 99201 – 99205 and for Established Patient: 99211 – 99215. Proper E/M coding is a requirement under the federal Health Insurance Portability and Accountability Act (HIPAA).

1 Evaluation and Management coding is based on seven (7) components:

- 2 1. Three (3) key components (*E/M coding is based on the level of service provided in*  
3 *each of these key components during each office visit.*)
  - 4 ○ Patient History
  - 5 ○ Examination
  - 6 ○ Medical decision making
- 7 2. Three (3) Contributory Components
  - 8 ○ Counseling
  - 9 ○ Coordination of Care
  - 10 ○ Nature of presenting problem
- 11 3. One (1) Other Component
  - 12 ○ Time

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14 The extent of the **patient history** is dependent upon the nature of the presenting problems  
15 and clinical judgment. There are four types of history that are defined; *problem focused,*  
16 *expanded problem focused, detailed, and comprehensive.*

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- 18 1. **Problem focused:** Chief complaint; brief history of present illness or problem.
- 19 2. **Expanded problem focused:** Chief complaint; brief history of present illness;  
20 problem persistent review.
- 21 3. **Detailed:** Chief complaint; extended history of present illness; problem pertinent  
22 system review extended to include a review of a limited number of additional  
23 systems; pertinent past, family, and social history directly related to the patients'  
24 problems.
- 25 4. **Comprehensive:** Chief complaint; extended history of present illness; review of  
26 systems which is directly related to the problems identifies in the history of present  
27 illness plus a review of systems of all additional body systems; complete past,  
28 family and social history.
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30 The extent of the **examination** performed is also dependent on the nature of the problem  
31 and clinical decision making. There are four types of examinations that are defined;  
32 *problem focused, expanded problem focused, detailed, and comprehensive.*

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- 34 1. **Problem focused exam:** A limited examination of the affected body area or organ  
35 system.
- 36 2. **Expanded problem focused:** A limited examination of the affected body area or  
37 organ system and other symptomatic or related organ system(s).
- 38 3. **Detailed:** An extended examination of the affected body areas and other  
39 symptomatic or related organ system(s).
- 40 4. **Comprehensive:** A general multi-system examination or a complete examination  
41 of a single organ system.

1 **Medical decision making** is an essential part and refers to the complexity of establishing  
2 a diagnosis and/or selecting a management option as measured by:

- 3 1. The number of possible diagnoses and the number of management options.
- 4 2. The amount or complexity of medical records, diagnostic tests, and other  
5 information.
- 6 3. The risk of serious complications, morbidity, and mortality as well as  
7 comorbidities.

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9 There are four recognized types of medical decision making: *straightforward*, *low*  
10 *complexity*, *moderate complexity*, and *high complexity*.

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12 It should be remembered that Medical Necessity for the level of service chosen must be  
13 demonstrated. The actual performance of a *comprehensive* level of service does not justify  
14 the billing of a *comprehensive* service if the presenting complaint could have been managed  
15 adequately with a *detailed* or lower level of service. It should also be remembered that it is  
16 the unusual case that presents with a condition that meets or exceeds *moderate* medical  
17 decision-making. In fact, typical cases, by their very nature as “typical,” generally meet  
18 only *straightforward* clinical decision-making criteria.

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20 After gathering all this information, the practitioner can select the appropriate level of E/M  
21 service based on the following:

- 22 1. The practitioner must meet or exceed three (3) out of three (3) key components for  
23 new patient 99201 – 99205 codes.
- 24 2. The practitioner must meet or exceed two (2) out of three (3) key components for  
25 established patient 99211 – 99215 codes.
- 26 3. Time override option: When counseling and coordination of care take more than  
27 50% of the practitioner’s face to face time with the patient and/or family, then time  
28 shall be the key factor in reporting/billing the level of E/M service. The time  
29 approximation must meet or exceed the level of E/M service reported/billed and  
30 should not be rounded to the next higher level.

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32 It must be appropriately and sufficiently documented in the medical record that the  
33 practitioner personally furnished the direct face-to-face time with the patient. Make  
34 sure that the start and end times of the visit are documented, along with the date of  
35 service.

1 The following table is a comparison of all new patient and established patient office service  
 2 codes:

3  
 4 **New Patient**

<b>Code</b>	<b>Presenting Problem</b>	<b>History</b>	<b>Examination</b>	<b>Clinical Decision-Making</b>	<b>Time</b>
99201	Self-limited or Minor	Problem-Focused	Problem-Focused	Straightforward	10 minutes
99202	Low to Moderate	Expanded Problem-Focused	Expanded Problem-Focused	Straightforward	20 minutes
99203	Moderate	Detailed	Detailed	Low	30 minutes
99204	Moderate to High	Comprehensive	Comprehensive	Moderate	45 minutes
99205	Moderate to High	Comprehensive	Comprehensive	High	60 minutes

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 6 **Established Patient**

<b>Code</b>	<b>Presenting Problem</b>	<b>History</b>	<b>Examination</b>	<b>Clinical Decision-Making</b>	<b>Time</b>
99211	Minimal	N/A	N/A	N/A	5 minutes
99212	Self-limited or Minor	Problem-Focused	Problem-Focused	Straightforward	10 minutes
99213	Low to Moderate	Expanded-Problem Focused	Expanded-Problem Focused	Low	15 minutes
99214	Moderate to High	Detailed	Detailed	Moderate	25 minutes
99215	Moderate to High	Comprehensive	Comprehensive	High	40 minutes

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1 **MEDICAL NECESSITY CRITERIA FOR E/M SERIES CODES**

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3 **Initial Evaluations (Use the appropriate E/M series code supported for each case)**

4 An initial evaluation of a patient presenting for healthcare services is performed to:

- 5 • Provide the basis for determining the working diagnosis;
- 6 • Reveal the possible occupational, social and/or psycho-social issues that may
- 7 impact care;
- 8 • Identify co-morbid or complicating factors; and
- 9 • Establish the basis for an initial plan of care including:
  - 10 ○ The need for additional diagnostic testing; and
  - 11 ○ The need for referral to other healthcare practitioner(s) for evaluation,
  - 12 management, co-management, or coordination of care;
- 13 • Develop initial set of treatment goals.

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15 **Re-Evaluations (Use the appropriate Established Patient E/M series code supported**  
16 **for each case)**

17 Established patient re-evaluation services are considered medically necessary when **all of**  
18 **the following** conditions are met:

- 19 • Re-evaluation is not a recurring routine assessment of patient status;
- 20 • The documentation of the re-evaluation includes all of the following elements:
  - 21 ○ An evaluation of progress toward current goals;
  - 22 ○ Making a professional judgment about continued care;
  - 23 ○ Making a professional judgment about revising goals and/or treatment or
  - 24 terminating services.

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26 **And any one of the following** indications is documented:

- 27 • The patient presents with new clinical findings;
- 28 • There is a significant change in the patient's condition;
- 29 • The patient has failed to respond to the therapeutic interventions outlined in the
- 30 current plan of care.

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32 A re-evaluation is not considered medically necessary once it has been determined that  
33 the patient has reached maximum therapeutic benefit for services provided, unless there  
34 is/are valid reason(s) documented, as clarified above, for the re-evaluation service.

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36 For specialty services, excluding Naturopathy and Podiatry, established patient E/M  
37 services, or re-evaluations, are not typically verified as medically necessary on a  
38 prospective basis (service to be rendered in the future). If there is a future point at which  
39 the practitioner decides a re-evaluation is necessary based on a new problem or  
40 abnormality, a submission of those new examination findings is required. If a patient has a  
41 new injury or a significant exacerbation requiring an established patient E/M or re-  
42 evaluation service, it is appropriate to submit documentation of that event and the clinical  
43 findings obtained. In addition, ASH cannot approve an established patient E/M service

1 without documentation of at least two of three of the required elements of the E/M code  
 2 (i.e., history, examination, level of complexity of medical decision making).

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 4 **EVALUATION MANAGEMENT FOR CONSULTATIONS AND MANAGEMENT**  
 5 **Office Consultations Overview**

6 An office consultation is a type of E/M service provided at the request of another physician  
 7 or appropriate source to either: 1) recommend care for a specific condition or problem; or  
 8 2) to determine whether to accept responsibility for ongoing management of the patient's  
 9 entire care or for the care of a specific condition or problem. There is one set of codes for  
 10 this service for new or established patients.

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 12 The practitioner must meet or exceed the three (3) out of three (3) key components of  
 13 history, examination, and medical decision making for the office consultation 99241-99245  
 14 codes. Counseling and/or coordination of care with other practitioners or agencies should  
 15 be provided consistent with the nature of the patient's problem(s) and the patient's and/or  
 16 the patient's family's needs. This service requires the practitioner to have direct (face-to-  
 17 face) contact with the patient and/or the patient's family.

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 19 The following information must be clearly documented in the patient's medical record: 1)  
 20 request for a consultation from an appropriate source [e.g. referral letter]; 2) the reason[s]  
 21 why a consultation is needed; 3) provision for a practitioner whose advice, opinion,  
 22 recommendation, suggestion, direction, or counsel, etc., is requested for evaluating and/or  
 23 treating a patient since that individual's expertise in a specific medical area is beyond the  
 24 scope of knowledge of the requesting practitioner; 4) a written report of findings and  
 25 recommendations from the consultant to the referring practitioner.

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 27 This service may **not** be used for: 1) another appropriately requested and documented  
 28 consultation pertaining to the same or a new problem; 2) the repeat use of consultation  
 29 codes; 3) any distinctly recognizable procedure or service provided on or following the  
 30 consultation; 4) assumption of care (all or partial); 5) consultation prompted by the patient  
 31 and/or the patient's family.

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 33 The following is a table of the new patient and established patient office consultation codes:

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 35 **New and Established Patients**

<b>Code</b>	<b>Presenting Problem</b>	<b>History</b>	<b>Examination</b>	<b>Clinical Decision-Making</b>	<b>Time</b>
99241	Self-limited or Minor	Problem-Focused	Problem-Focused	Straightforward	15 minutes

Code	Presenting Problem	History	Examination	Clinical Decision-Making	Time
99242	Low to Moderate	Expanded Problem-Focused	Expanded Problem-Focused	Straightforward	30 minutes
99243	Moderate	Detailed	Detailed	Low	40 minutes
99244	Moderate to High	Comprehensive	Comprehensive	Moderate	60 minutes
99245	Moderate to High	Comprehensive	Comprehensive	High	80 minutes

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### **PROLONGED SERVICES CODING OVERVIEW**

Codes 99354 and 99355 are used when a physician/qualified health care professional provides prolonged services involving direct (face to face) patient contact that is beyond the usual service in the outpatient setting. The time for usual service refers to the typical/average time units associated with each level of E/M service. This service is reported in addition to other practitioner services, including E/M services at any level. Codes 99354 and 99355 are used to report the total duration of face-to-face time spent by a practitioner on a given date providing prolonged services, even if the time spent by the practitioner on that date is not continuous.

**Code 99354** is used to report the first hour of prolonged services on a given date. This code may be used to report a total duration of prolonged services (add-on) of 30 – 60 minutes on a given date. 99354 must be used in conjunction with code 99203 – 99205, or 99213 – 99215.

Prolonged services of less than thirty (30) minutes total duration on a given date is not separately reported because the work involved is included in the total work of the evaluation and management code.

**Code 99355** is used to report each additional thirty (30) minutes beyond the first hour (in addition to 99354). 99355 may be used to report the final 15-30 minutes of prolonged service on a given date. Prolonged service of less than 15 minutes beyond the first hour or less than 15 minutes beyond the final 30 minutes is not reported separately. 99355 may only be used in conjunction with code 99354. Code 99355 may be multiplied.

1 The following examples illustrate the correct reporting of prolonged services with direct  
 2 patient contact in the office setting:  
 3

Total Duration of Prolonged Services	Code(s)
<less than 30 minutes	Not reported separately
30 – 74 minutes (1/2 hour – 1 hr 14 min)	E/M code + 99354 x 1
75 – 104 minutes (1 hr 15 min – 1 hr 44 min)	E/M code + 99354 x 1 and 99355 x 1
105 – 134 minutes (1 hr 45 min – 2 hr 14 min)	E/M code + 99354 x 1 and 99355 x 2
135- 164 minutes (2 hr 15 min – 2 hr 44 min)	E/M code + 99354 x 1 and 99355 x 3
165 – 194 minutes (2 hr 45 min – 3 hr 14 min)	E/M code + 99354 x 1 and 99355 x 4

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**Criteria for Using and Submitting Code 99354**

1. The services meet the code 99354 duration requirement when the practitioner has spent an extra 30 to 74 minutes in addition to a standard E/M service.
2. Services must be Medically Necessary during the prolonged E/M service.
3. The duration and the content of the evaluation and management code must be documented in the medical record.

**Examples of Improper Uses of Code 99354**

1. Total physician direct face to face services that is equal or less than the threshold time of the E/M service.
2. Time spent on rendering therapies or other services that are paid separately.
3. Services/activities conducted during the first thirty (30) minutes of E/M service.
4. Discussions that apply to non-covered service or conditions.
5. The time spent by office staff with the patient, or time that the patient remains unaccompanied in the office.
6. Inefficient application of clinical services that result in prolonged face-to-face time in the absence of documented necessity.

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**Criteria for Using and Submitting Code 99355**

1. Time spent is supported by the clinical documentation that indicates the medical complexity and Medical Necessity.
2. Only to be used in conjunction with 99354.



1 **MEDICAL NECESSITY CRITERIA FOR PHYSICAL THERAPY (PT),**  
2 **OCCUPATIONAL THERAPY (OT), AND ATHLETIC TRAINING (AT)**  
3 **EVALUATION AND RE-EVALUATION SERVICES**

4 **Evaluation**

5 An initial evaluation for a new condition by a Physical Therapist, Occupational Therapist,  
6 or Athletic Trainer is defined as the evaluation of a patient:

- 7 • For which this is their first encounter with the practitioner or practitioner group;
- 8 • Who presents with:
  - 9 ○ A new injury or new condition; or
  - 10 ○ The same or similar complaint after discharge from previous care;
- 11 • Choice of code is dependent upon the level of complexity.

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13 Relevant CPT Codes: CPT 97161, 97162, and 97163 – Physical Therapy evaluation, CPT  
14 97165, 97166, and 97167 – Occupational Therapy evaluation, and CPT 97169, 97170, and  
15 97171 - Athletic Training evaluation

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17 The evaluation codes reflect 3 levels of patient presentation: low-complexity, moderate-  
18 complexity, and high-complexity. Four components are used to select the appropriate PT  
19 evaluation CPT code. These include: 1. Patient history and comorbidities; 2. Examination  
20 and the use of standardized tests and measures; 3. Clinical presentation; 4. Clinical decision  
21 making. Four components are used to select the appropriate OT evaluation CPT code.  
22 These include: 1. Occupational profile and client history (medical and therapy); 2.  
23 Assessments of occupational performance; 3. Clinical decision making; 4. Development of  
24 plan of care. Four components are used to select the appropriate AT evaluation CPT code.  
25 These include: 1. History and physical activity profile; 2. Examination; 3. Clinical decision  
26 making; 4. Development of plan of care conducted by the physician or other qualified  
27 health care professional. Coordination, consultation, and collaboration of care with  
28 physicians, other qualified health care professionals, or agencies is provided consistent  
29 with the nature of the problem(s) and the needs of the patient, family, and/or other  
30 caregivers.

1 **CPT Codes and Descriptions for PT, OT and AT Services**

<b>CPT Code</b>	<b>CPT Code Description</b>
97161	Physical therapy evaluation, low complexity, requiring these components: <ul style="list-style-type: none"> <li>• A history with no personal factors and/or comorbidities that impact the plan of care;</li> <li>• An examination of body system(s) using standardized tests and measures addressing 1-2 elements from any of the following: body structures and functions, activity limitations, and/or participation restrictions;</li> <li>• A clinical presentation with stable and/or uncomplicated characteristics; and</li> <li>• Clinical decision making of low complexity using standardized patient assessment instrument and/or measurable assessment of functional outcome. Typically, 20 minutes are spent face-to-face with the patient and/or family.</li> </ul>
97162	Physical therapy evaluation, moderate complexity, requiring these components: <ul style="list-style-type: none"> <li>• A history with 1-2 personal factors and/or comorbidities that impact the plan of care;</li> <li>• An examination of body system(s) using standardized tests and measures addressing a total of 3 or more elements from any of the following: body structures and functions, activity limitations, and/or participation restrictions;</li> <li>• An evolving clinical presentation with changing characteristics; and</li> <li>• Clinical decision making of moderate complexity using standardized patient assessment instrument and/or measurable assessment of functional outcome. Typically, 30 minutes are spent face-to-face with the patient and/or family.</li> </ul>
97163	Physical therapy evaluation, high complexity, requiring these components: <ul style="list-style-type: none"> <li>• A history with 3 or more personal factors and/or comorbidities that impact the plan of care;</li> <li>• An examination of body system(s) using standardized tests and measures addressing a total of 4 or more elements from any of the following: body structures and functions, activity limitations, and/or participation restrictions;</li> <li>• A clinical presentation with unstable and unpredictable characteristics; and</li> <li>• Clinical decision making of high complexity using standardized patient assessment instrument and/or measurable assessment of functional outcome. Typically, 45 minutes are spent face-to-face with the patient and/or family.</li> </ul>

CPT Code	CPT Code Description
97165	Occupational therapy evaluation, low complexity, requiring these components: • An occupational profile and medical and therapy history, which includes a brief history including review of medical and/or therapy records relating to the presenting problem; • An assessment(s) that identifies 1-3 performance deficits (i.e., relating to physical, cognitive, or psychosocial skills) that result in activity limitations and/or participation restrictions; and • Clinical decision making of low complexity, which includes an analysis of the occupational profile, analysis of data from problem focused assessment(s), and consideration of a limited number of treatment options. Patient presents with no comorbidities that affect occupational performance. Modification of tasks or assistance (e.g., physical or verbal) with assessment(s) is not necessary to enable completion of evaluation component. Typically, 30 minutes are spent face-to-face with the patient and/or family.
97166	Occupational therapy evaluation, moderate complexity, requiring these components: • An occupational profile and medical and therapy history, which includes an expanded review of medical and/or therapy records and additional review of physical, cognitive, or psychosocial history related to current functional performance; • An assessment(s) that identifies 3-5 performance deficits (i.e., relating to physical, cognitive, or psychosocial skills) that result in activity limitations and/or participation restrictions; and • Clinical decision making of moderate analytic complexity, which includes an analysis of the occupational profile, analysis of data from detailed assessment(s), and consideration of several treatment options. Patient may present with comorbidities that affect occupational performance. Minimal to moderate modification of tasks or assistance (e.g., physical or verbal) with assessment(s) is necessary to enable patient to complete evaluation component. Typically, 45 minutes are spent face-to-face with the patient and/or family.

CPT Code	CPT Code Description
97167	Occupational therapy evaluation, high complexity, requiring these components: • An occupational profile and medical and therapy history, which includes review of medical and/or therapy records and extensive additional review of physical, cognitive, or psychosocial history related to current functional performance; • An assessment(s) that identify 5 or more performance deficits (i.e., relating to physical, cognitive, or psychosocial skills) that result in activity limitations and/or participation restrictions; and • A clinical decision-making is of high analytic complexity, which includes an analysis of the patient profile, analysis of data from comprehensive assessment(s), and consideration of multiple treatment options. Patient presents with comorbidities that affect occupational performance. Significant modification of tasks or assistance (e.g., physical or verbal) with assessment(s) is necessary to enable patient to complete evaluation component. Typically, 60 minutes are spent face-to-face with the patient and/or family.
97169	Athletic training evaluation, low complexity, requiring these components: • A history and physical activity profile with no comorbidities that affect physical activity; • An examination of affected body area and other symptomatic or related systems addressing 1-2 elements from any of the following body structures, physical activity, and/or participation deficiencies; and • Clinical decision making of low complexity using standardized patient assessment instrument and/or measurable assessment of functional outcome. Typically, 15 minutes are spent face-to-face with the patient and/or family.
97170	Athletic training evaluation, moderate complexity, requiring these components: • A medical history and physical activity profile with 1-2 comorbidities that affect physical activity; • An examination of affected body area and other symptomatic or related systems addressing a total of 3 or more elements from any of the following: body structures, physical activity, and/or participation deficiencies; and • Clinical decision making of moderate complexity using standardized patient assessment instrument and/or measurable assessment of functional outcome. Typically, 30 minutes are spent face-to-face with the patient and/or family.

CPT Code	CPT Code Description
97171	Athletic training evaluation, high complexity, requiring these components: ● A medical history and physical activity profile, with 3 or more comorbidities that affect physical activity; ● A comprehensive examination of body systems using standardized tests and measures addressing a total of 4 or more elements from any of the following: body structures, physical activity, and/or participation deficiencies; ● Clinical presentation with unstable and unpredictable characteristics; and ● Clinical decision making of high complexity using standardized patient assessment instrument and/or measurable assessment of functional outcome. Typically, 45 minutes are spent face-to-face with the patient and/or family.

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The initial evaluation should document the necessity of a course of therapy through objective findings and subjective patient/caregiver self-reporting. Initial evaluations must be completed by the therapist or physician/Non-Physician Practitioner that will be providing the therapy services. Initial evaluations are completed to determine the medical necessity of initiating rehabilitative therapy or skilled instruction in maintenance activities that the patient and/or caregiver can perform at home. The evaluation process assesses, for example, the severity and impact of the current problem, the possibility of multi-site or multi-system involvement, the presence of pre-existing systemic conditions (e.g., diseases), and the stability of the condition. If the patient presents with multi-system involvement and/or multiple site involvement, all pertinent areas/conditions should be assessed at the initial evaluation (i.e., cervical pain and knee pain; low back pain and rotator cuff irritation; cervical pain and low back pain).

Factors that impact the level of evaluation include the following:

- Patient’s age
- Time since onset of injury/illness/exacerbation
- Mechanism of injury/illness/exacerbation
- Past medical and surgical history
- Co-morbidities and their impact on improvement
- Prior level of function
- Current level of function
- Status of current condition
- Patient’s cognitive status and safety concerns
- Patient’s level of motivation
- Patient’s home situation (environment and family support)
- Objective examination findings
- Goals and goal agreement with the patient
- Rehab potential (prognosis) and probable outcome
- Expected progression of patient

1 Only one initial evaluation code should be used, and all presenting complaints and  
 2 problems evaluated. If over the course of an episode of treatment, a new, unrelated  
 3 diagnosis occurs, another initial evaluation may be covered. See *Physical Therapy Medical*  
 4 *Policy/Guideline (CPG 135 – S)*, *Occupational Therapy Medical Policy/Guideline (CPG*  
 5 *155 – S)*, and *Athletic Training Medical Policy/Guideline (CPG 183 – S)* for more detail.

6  
 7 Providers/practitioners should consider the following points when billing for an evaluation.

- 8 • These evaluation codes are untimed, billable as one unit.
- 9 • Do not bill for a therapy initial evaluation for each therapy discipline on more than  
 10 one date of service. If an evaluation spans more than one day, the evaluation should  
 11 only be billed as one unit for the entire evaluation service (typically billed on the  
 12 day that the evaluation is completed). Do not count as therapy “treatment” the  
 13 additional minutes needed to complete the evaluation during the subsequent  
 14 session(s).
- 15 • Do not bill range of motion (ROM) and/or physical performance test or  
 16 measurement codes (CPT, 95851-95852, 97750, 97755, respectively) on the same  
 17 day as the initial evaluation. The procedures performed are included in the initial  
 18 evaluation codes and are not allowed by the Correct Coding Initiative (CCI) edits.
- 19 • Do not bill therapy screenings utilizing the evaluation codes. Screenings are not  
 20 billable services.
- 21 • Evaluations for deconditioning after hospitalization where it is anticipated that prior  
 22 functional abilities would spontaneously return through patient, caregiver and/or  
 23 nursing activities are not considered medically necessary and are not covered.
- 24 • If treatment is given on the same day as the initial evaluation, the treatment is billed  
 25 using the appropriate CPT codes. The documentation must clearly describe the  
 26 treatment that was provided in addition to the evaluation.

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 28 **Re-evaluation Services by Physical Therapist, Occupational Therapist or Athletic**  
 29 **Trainer**

30 Re-evaluations are distinct from therapy assessments. There are several routine  
 31 reassessments that are not considered re-evaluations. These include ongoing reassessments  
 32 that are part of each skilled treatment session, progress reports, and discharge summaries.  
 33 Re-evaluation provides additional objective information not included in documentation of  
 34 ongoing assessments, treatment, or progress notes. Assessments are considered a routine  
 35 aspect of intervention and are not billed separately from the intervention. Continuous  
 36 assessment of the patient’s progress is a component of the ongoing therapy services and is  
 37 not payable as a re-evaluation.

1 Re-evaluation services are considered medically necessary when all of the following  
 2 conditions are met:

- 3 • Re-evaluation is not a recurring routine assessment of patient status;
- 4 • The documentation of the re-evaluation includes all of the following elements:
  - 5 ○ An evaluation of progress toward current goals;
  - 6 ○ Making a professional judgment about continued care;
  - 7 ○ Making a professional judgment about revising goals and/or treatment or
  - 8 terminating services.

9  
 10 **AND ALL of the following indications are documented:**

- 11
- 12 • For which patient is currently undergoing a course of care over a reasonable amount
- 13 of time;
- 14 • An exacerbation or significant change in patient/client status or condition;
- 15 • Determined medically necessary when updated clinical findings submitted support
- 16 medical necessity of continued skilled intervention as mentioned above.

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 18 Relevant CPT Codes: CPT 97164 – Physical Therapy re-evaluation, CPT 97168 –  
 19 Occupational Therapy re-evaluation, and CPT 97172 Athletic Training re-evaluation.  
 20

CPT Code	CPT Code Description
97164	Re-evaluation of physical therapy established plan of care, requiring these components: • An examination including a review of history and use of standardized tests and measures is required; and • Revised plan of care using a standardized patient assessment instrument and/or measurable assessment of functional outcome. Typically, 20 minutes are spent face-to-face with the patient and/or family
97168	Re-evaluation of occupational therapy established plan of care, requiring these components: • An assessment of changes in patient functional or medical status with revised plan of care; • An update to the initial occupational profile to reflect changes in condition or environment that affect future interventions and/or goals; and • A revised plan of care. A formal re-evaluation is performed when there is a documented change in functional status or a significant change to the plan of care is required. Typically, 30 minutes are spent face-to-face with the patient and/or family
97172	Re-evaluation of athletic training established plan of care requiring these components: • An assessment of patient’s current functional status when there is a documented change; and • A revised plan of care using a standardized patient assessment instrument and/or measurable assessment of functional outcome with an update in management options, goals and interventions. Typically, 20 minutes are spent face-to-face with the patient and/or family.

1 A re-evaluation is indicated when there is an exacerbation or significant change in the  
 2 status or condition of the patient. Re-evaluation is a more comprehensive assessment that  
 3 includes ALL of the components of the initial evaluation, such as:

- 4 • Data collection with objective measurements taken based on appropriate and  
 5 relevant assessment tests and tools using comparable and consistent methods;
- 6 • Making a judgment as to whether skilled care is still warranted;
- 7 • Organizing the composite of current problem areas and deciding a priority/focus of  
 8 treatment;
- 9 • Identifying the appropriate intervention(s) for new or ongoing goal achievement;
- 10 • Modification of intervention(s);
- 11 • Revision in plan of care if needed;
- 12 • Correlation to meaningful change in function; AND
- 13 • Deciphering effectiveness of intervention(s).

14  
 15 See *Physical Therapy Medical Policy/Guideline (CPG 135 – S)*, *Occupational Therapy*  
 16 *Medical Policy/Guideline (CPG 155 – S)*, and *Athletic Training Medical Policy/Guideline*  
 17 *(CPG 183 – S)* clinical practice guidelines for more detail.

18  
 19 Providers/practitioners should consider the following points when billing for a re-  
 20 evaluation.

- 21 • Indications for a re-evaluation include an exacerbation or significant change in  
 22 patient/client status or condition.
- 23 • When re-evaluations are done for a significant change or exacerbation in status or  
 24 condition, documentation must show a significant improvement, decline or change  
 25 in the patient’s diagnosis, condition or functional status that was not anticipated in  
 26 the current plan of care. The plan of care may need to be revised if significant  
 27 changes are made, such as a change in the long-term goals.
- 28 • If a patient is hospitalized during the therapy interval, a re-evaluation may be  
 29 medically necessary if there has been a significant change in the patient’s condition  
 30 which has caused a change in function, long term goals, and/or treatment plan.
- 31 • Therapy re-evaluations should contain all the applicable components of an initial  
 32 evaluation and must be completed by a clinician.
- 33 • A re-evaluation is not a routine, recurring service. Do not bill for routine re-  
 34 evaluations, including those done for the purpose of completing an updated plan of  
 35 care, a recertification report, a progress report, or a physician progress report.  
 36 Although some state regulations and practice acts require re-evaluations at specific  
 37 intervals, for ASH payment, re-evaluations must meet ASH coverage guidelines.
- 38 • These re-evaluation codes are untimed, billable as one unit.
- 39 • Do not bill for re-evaluations as unlisted codes (97039, 97139, 97799), with ROM  
 40 and/or physical performance test or measurement codes (95851-95852, 97750,  
 41 97755, respectively).



1 **Medical Necessity Criteria for Speech Language Pathologist (SLP) Services**  
 2 **Evaluation**

3 Relevant CPT Codes: Speech/hearing evaluation (CPT codes 92521, 92522, 92523, and  
 4 92524)  
 5

<b>CPT Code</b>	<b>CPT Code Description</b>
92521	Evaluation of speech fluency (e.g., stuttering, cluttering)
92522	Evaluation of speech sound production (e.g., articulation, phonological process, apraxia, dysarthria)
92523	Evaluation of speech sound production (e.g., articulation, phonological process, apraxia, dysarthria); with evaluation of language comprehension and expression (e.g., receptive, and expressive language)
92524	Behavioral and qualitative analysis of voice and resonance

6  
 7 An evaluation for SLP services is indicated, reasonable and necessary for the clinician to  
 8 perform to determine:

- 9 • If there is an expectation that the services will be appropriate for the patient's  
 10 condition.
- 11 • The patient's level of function and is focused on identifying what the patient wants  
 12 and needs to do, and on identifying those factors that help or hinder the performance  
 13 of those activities.

14  
 15 During the first patient contact, the clinician evaluates and documents:

- 16 • A diagnosis (where allowed) and description of the specific problem to be  
 17 evaluated and/or treated. This should include the specific body area(s) evaluated.  
 18 Include all conditions and complexities that may impact the treatment. A  
 19 description might include, for example, the pre-morbid function, date of onset,  
 20 and current function;
- 21 • Objective measurements, preferably standardized patient assessment instruments  
 22 and/or outcomes measurement tools related to current functional status, when  
 23 these are available and appropriate to the condition being evaluated;
- 24 • Clinician's clinical judgments or subjective impressions that describe the current  
 25 functional status of the condition being evaluated, when they provide further  
 26 information to supplement measurement tools; and
- 27 • A determination that treatment is not needed, or, if treatment is needed a  
 28 prognosis for return to pre-morbid condition or maximum expected condition with  
 29 expected time frame and a plan of care.

1 In addition to the general information above, the evaluation includes the identification,  
 2 assessment, diagnosis, and evaluation for disorders of: speech, articulation, fluency, and  
 3 voice (including respiration, phonation, and resonance); language skills (involving the  
 4 parameters of phonology, morphology, syntax, semantics, and pragmatics, and including  
 5 disorders of receptive and expressive communication in oral, written, graphic, and manual  
 6 modalities); and cognitive aspects of communication (including communication disability  
 7 and other functional disabilities associated with cognitive impairment).

### 8 9 **Re-evaluations**

10 Previously CPT Code: Current Procedural Terminology does not define a re-evaluation  
 11 code for speech language pathology; and thus, the evaluation code should be used.  
 12 Currently a HCPCS Code: S9152 defines a Speech therapy, re-evaluation. This service is  
 13 not separately priced by Medicare part B (e.g., services not covered, bundled, used by part  
 14 A only, etc.), however some insurance companies may recognize it. Regardless, the  
 15 documentation should differentiate between evaluation/re-evaluation and screening.  
 16 Screening assessments are non-covered.

17  
 18 A re-evaluation is the re-assessment of the patient's performance and goals, after an  
 19 intervention plan has been instituted, in order to determine the type and amount of change  
 20 in treatments if needed. A re-evaluation may be indicated during an episode of care when  
 21 a significant improvement, decline, or change in the patient's condition occurs. Re-  
 22 evaluation requires the same professional skill as evaluation.

23  
 24 The decision to provide a re-evaluation shall be made by the clinician making a  
 25 professional judgment about continued care, modifying goals and/or treatment or  
 26 terminating services. A formal re-evaluation is covered only if the documentation supports  
 27 the need for further tests and measurements after the initial evaluation. Re-evaluations are  
 28 usually focused on the current treatment and may not be as extensive as initial evaluations.  
 29 Re-evaluations may be appropriate at a planned discharge.

30  
 31 Continuous assessment of the patient's progress is a component of ongoing therapy  
 32 services and is not a re-evaluation. A re-evaluation is not a routine, recurring service but is  
 33 focused on evaluation of progress toward current goals, making a professional judgment  
 34 about continued care, modifying goals and/or treatment or terminating services. Infrequent  
 35 re-evaluations of maintenance programs may be covered when deemed necessary, if they  
 36 require the skills of the SLP, and they are a distinct and separately identifiable service  
 37 which can only be done safely by the SLP.

### 38 39 **Discharge Evaluations**

- 40 • Discharge evaluations are subject to a determination of medical necessity. They  
 41 **may** be appropriate to report the health status of a patient to a referring health care  
 42 practitioner or to establish a baseline health status upon discharge in complex cases  
 43 where the patient has a history of recurrent episodes and/or has a complicated  
 44 condition and has reached Maximum Therapeutic Benefit (MTB).

1 **Evaluation and Re-Evaluation Services may be non-covered services (Per applicable**  
 2 **client summaries)**

3 **For example:**

- 4 • Evaluation of a well patient regardless of age for the purpose of maintenance,  
 5 prevention or wellness.
- 6 • Pre-participation sport physicals.
- 7 • *Pre-employment physicals.*

8  
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