

# **Timing is Everything: Best Practices in Timing Coverage, Coding & Payment**

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**The Medical Device Regulatory and  
Compliance Congress  
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## Calendar of Reimbursement Events

	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sep	Oct	Nov	Dec
<b>RV</b>	<u>Jan</u> : New annual rates go into effect	<u>Feb</u> : Practicing Physician Adv Council (PPAC) meets quarterly			<u>May</u> : Practicing Physician Adv Council meets quarterly		<u>Jul</u> : Notice on proposed new rates; 60-day comment period	<u>Aug</u> : Practicing Physician Adv Council meets quarterly			<u>Nov</u> : Final rule on new rates <u>Nov</u> : Practicing Physician Adv Council meets quarterly	
<b>HIP</b>	<u>Jan</u> : ICD-9 applic. due 2 mos. before March mtg	<u>Feb</u> : Public mtg on new tech add-on applications from previous year	<u>March</u> : ICD-9 cmte meets	<u>Apr</u> : New ICD-9 codes implemented  from previous year's Oct applications for certain new technologies	<u>May</u> : notice on proposed new rates		<u>Jul</u> : ICD-9 applic. due 2 mos. before Sept mtg	<u>Aug</u> : final rule for new rates effective in Oct	<u>Sept</u> : ICD-9 cmte. meets	<u>Oct</u> : new rates go into effect for next FY <u>Oct</u> : new ICD9 codes implemented from March mtg of same year and from Sept mtg of previous year <u>Oct</u> : new tech add-on apps due, for FY '07		<u>Dec</u> : data bases for new tech add-on apps due 12/31 <u>Dec</u> : meet with CMS or provide data for changes for Oct of next year
<b>HOP</b>	<u>Jan</u> : new annual rates go into effect <u>Jan</u> : C+G HCPCS II temp codes issued each quarter	<u>Feb</u> : APC advisory panel public mtg	<u>Mar</u> : apps for new-tech APCs or pass-thrus due; earliest approval = 7/1	<u>Apr</u> : transitional implementation of new coding edits for some devices <u>Apr</u> : C+G HCPCS II temp	<u>Jun</u> : apps for new-tech APCs or pass-thrus due; earliest approval = 10/1		<u>Jul-Aug</u> : notice on new rates; 60 day comment <u>Jul</u> : transitional implementation of new coding edits <u>Jul</u> : C+G HCPCS II temp codes issued each quarter	<u>Aug/Sept</u> : APC advisory panel public mtg <u>Sept</u> : applications for new-tech APCs or pass-throughs due; earliest approval = 1/1		<u>Oct</u> : transitional implement. of new coding edits for some devices <u>Oct</u> : C+G HCPCS II temporary codes issued each quarter		<u>Nov</u> : Final rule on new rates <u>Dec</u> : apps for new-tech APCs or pass-thru's due; earliest approval = 4/1
<b>ASC</b>	<u>Jan</u> : CMS must have new ASC payment system working by Jan '08	<u>Feb</u> : RUC mtg to assign work values to new CPTs (ok'd in previous Oct <u>Feb</u> : CPT editorial panel meets	<u>Mar</u> : CPT apps due for Jun meeting of editorial panel	<u>Apr</u> : RUC mtg to assign workvalues to new CPTs (ok'd in previous Feb mtg)	<u>May</u> : Interim final list of procedure s covered in ASCs published	<u>Jun</u> : CPT editorial panel meets to edit codes for '08	<u>July</u> : Final list of covered procedures in ASC implemented <u>July</u> : CPT apps due for upcoming Oct mtg of editorial panel	<u>Oct</u> : RUC mtg to assign work values to new CPTs (ok'd in previous Jun) <u>Oct</u> : CPT editorial panel meets to edit codes for '08			<u>Nov</u> : CPT applications due for upcoming Feb mtg of editorial panel <u>Nov</u> : Prop. list of covered procedures in ASCs for next year; comments due in 60 days	
<b>Lab</b>	<u>Jan</u> : New rates effective Jan 1; CMS sends rates for new codes to contract'rs							<u>July</u> : Public mtg on crosswalk vs gapfill	<u>Sept</u> : CMS posts new code cross-walk or gap-fill		<u>Nov</u> : CMS makes proposed new rates for codes for next year	
<b>DME</b>	<u>Jan</u> : DME products assigned to codes; certain codes updated quarterly; some annually			<u>Apr</u> : DME products assigned to codes; certain codes updated quarterly; some annually			<u>Jul</u> : DME products assigned to codes; certain codes updated quarterly; some annually			<u>Oct</u> : DME products assigned to codes; certain codes updated quarterly; some annually		
	<u>Jan</u> : Publication of new HCPCS II codes; need 3 mos. market data; applications for changes in following year's codes due					<u>June</u> : Public mtg to review coding applications and accept public comment					<u>Nov</u> : Publication of new HCPC II codes, to be effective Jan next	

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<b>Payment</b>	<p><u>Jan:</u> New HOP and RVS rates go into effect for year</p> <p><u>Jan:</u> Lab New rates go into effect; CMS sends rates for new lab codes to contractors</p>	<p><u>Feb:</u> HIP Public mtg on new tech add-on apps from prior year</p> <p><u>Feb:</u> APC advisory panel public mtg</p> <p><u>Feb:</u> RVS Practicing Phys Adv Council quarterly</p>	<p><u>Mar:</u> HOP apps for new-tech APCs or pass-thrus due; earliest approval = 7/1</p>	<p><u>May:</u> HIP notice on proposed new rates</p> <p><u>May:</u> ASC Interim final list of covered procedures published</p> <p><u>May:</u> RVS Practicing Phys. Adv. Council quarterly mtg</p>	<p><u>Jun:</u> HOP apps for new-tech APCs or pass-thrus due; earliest approval = 10/1</p>	<p><u>Jul:</u> Labs public mtg on cross walk vs gapfill</p> <p><u>Jul:</u> RVS, HOP notices on proposed new rates; 60day comment</p> <p><u>Jul:</u> ASC final list of covered procedures</p>	<p><u>Aug:</u> HIP final rule on new rates effective Oct</p> <p><u>Aug:</u> RVS Practicing Physician Adv Council quart. mtg</p> <p><u>Aug/Sept:</u> APC advis comm mtg</p>	<p><u>Sep:</u> Labs: CMS posts new code cross walk or gapfill for labs</p> <p><u>Sep:</u> HOP applications for new-tech APCs or pass-thrus due; earliest approval = 1/1</p>	<p><u>Oct:</u> HIP new rates go into effect for next fiscal year</p> <p><u>Oct:</u> HIP new tech add-on apps due, for FY '07</p>	<p><u>Nov:</u> RVS, HOP final rules on new rates</p> <p><u>Nov:</u> RVS Practicing Physician Adv coun. quart. mtg</p> <p><u>Nov:</u> ASC Proposed list of covered proc. for next year; comment due in 60 days</p>	<p><u>Dec:</u> HIP Databases for new tech add-on apps due; meet w/ CMS to make recom on new year rates, changes</p> <p><u>Dec:</u> RVS Practicing Phys Adv Cn quart. mtg</p> <p><u>Dec:</u> HOP apps for new-tech APCs/pass-thru's due; poss ok = 4/1</p>	
<b>Coding</b>	<p><u>Jan:</u> C+G HCPCS II temp codes issued quarterly</p> <p><u>Jan:</u> DME products assigned codes; certain codes updated quarterly; some annually</p> <p><u>Jan:</u> Publication of new HCPCSII codes; applications for following year's due before 1/3</p>	<p><u>Feb:</u> RUC mtg to assign work values to new CPTs(ok'd in previous Oct)</p> <p><u>Feb:</u> CPT editorial panel meets to edit codes for '07</p>	<p><u>Mar:</u> CPT apps due for Jun meeting of editorial panel</p> <p><u>Mar:</u> ICD-9 cmte meets</p>	<p><u>Apr:</u> New ICD-9 codes implemtd from prior year's Oct applications for certain new technologies</p> <p><u>Apr:</u> C+G HCPCS II temp codes issued</p> <p><u>Apr:</u> DME assigned to codes</p> <p><u>Apr:</u> RUC mtg to assign workvalues to new CPTs (ok'd in previous Feb mtg)</p> <p><u>Apr:</u> HOP Transitional implementation of new coding edits for some devices</p>	<p><u>Jun:</u> CPT editorial panel meets to edit codes for '08</p> <p><u>Jun:</u> public mtg to review coding apps for DME</p>	<p><u>Jul:</u> C+G HCPCS II temp codes issued</p> <p><u>Jul:</u> ICD-9 applic. due 2 mos. before Sept. mtg</p> <p><u>Jul:</u> CPT apps due for Oct mtg of editorial panel</p> <p><u>Jul:</u> DME products assigned to codes</p> <p><u>Jul:</u> HOP Transitional implementation of new coding edits for some devices</p>	<p><u>Sep:</u> ICD-9 Cmte. meets</p>	<p><u>Oct:</u> New ICD-9 codes implemented from this year's Mar ICD9 mtg</p> <p><u>Oct:</u> C+G HCPCS II temp codes issued</p> <p><u>Oct:</u> RUC mtg to assign work values to new CPTs (ok'd in previous Jun)</p> <p><u>Oct:</u> HOP Transitional implementation of new coding edits for some devices</p> <p><u>Oct:</u> CPT editorial panel meets to edit codes for '08</p> <p><u>Oct:</u> DME products assigned to codes; certain codes updated quarterly; some annually</p>	<p><u>Nov:</u> CPT applications due for upcoming Feb mtg of editorial panel</p> <p><u>Nov:</u> CMS makes proposed new rates for codes for lab tests available in Nov; to be effective Jan of next year</p>			
<b>Coverage</b>	<div style="display: flex; align-items: center;"> <div style="border: 1px solid black; padding: 5px; margin-right: 10px;">National or Local?</div> <div style="margin-right: 10px;">→</div> <div style="border: 1px solid black; padding: 5px; margin-right: 10px;">If national...</div> <div style="margin-right: 10px;">→</div> <div style="display: flex; flex-direction: column;"> <ul style="list-style-type: none"> <li>CMS must issue a decision memorandum in national coverage decisions within 6 months, if it seeks no external review</li> <li>CMS must issue a decision memorandum in national coverage decisions within 9 months, if CMS seeks external reviews</li> <li>In both cases, CMS must allow 30 days comment on the draft</li> </ul> </div> </div> <div style="display: flex; align-items: center; margin-top: 10px;"> <div style="border: 1px solid black; padding: 5px; margin-right: 10px;">If local...</div> <div style="margin-right: 10px;">→</div> <div style="border: 1px solid black; padding: 5px;"> <ul style="list-style-type: none"> <li>Informal?</li> <li>Formal LMRP?</li> </ul> </div> </div>											

**Calendar of Reimbursement Events**

<b>Site-of-Service or Benefit Category</b>	<b>Event</b>	<b>First Quarter</b>	<b>Second Quarter</b>	<b>Third Quarter</b>	<b>Fourth Quarter</b>	<b>Following Year</b>
Hospital Inpatient - Payment	Inpatient Prospective Payment System Notice of Proposed Rulemaking: annual update		Usually May			
	Inpatient PPS Final Rules			August 1		
	IPPS Implementation				October 1	
	Recommendations for following year's updates & changes				Early December	
	IPPS New Tech program – applications due for FY07 implementation				Oct. 15, 2005, with complete databases dues Dec. 30, 05	
	IPPS New Tech program – public meeting					February 2006
Hospital Inpatient – Coding: Procedures and diagnoses	ICD-9 Committee meetings; conducted by CMS & NCHS staff	Mar.. 23-24, 2006		Sept. 28-29, 2006		
	ICD-9 applications due 2 months before meeting	Jan. 23-24, 2006		July 28-29, 2006		
	New ICD-9 codes implemented				Oct. 1, 2006 for decision made after Mar. mtg.	October 1, 2007 for Sept mtg. or April 1, 2007 for certain new tech. applications
Hospital Outpatient Payment	Hospital Outpatient Prospective Payment System - Notice of Proposed Rulemaking: annual update			Late July- Early Aug; comments		

Site-of-Service or Benefit Category	Event	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Following Year
				due in 60 days: Sept/Oct		
	APC Advisory Panel Public Meeting	Feb. 22-24, 2006		Aug. or Sept.		
	Hospital Outpatient PPS – Final Rules				November	
	Hospital Outpatient PPS - Implementation	January 1				January 1
	Hospital Outpatient PPS – transitional implementation of new coding edits for certain devices		April 1	July 1	October 1	
	Hospital Outpatient PPS – New Technology APC or device pass-through programs – applications due	March 1 for earliest approval by July 1	June 1 for earliest approval by October 1	September 1 for earliest approval by January 1	December 1 for earliest approval by April 1	
Hospital Outpatient – special temporary coding: HCPCS II	HCPCS II codes (c-codes; g-codes) for Hospital Outpatient PPS billing only; conducted by CMS staff; requested/coordinated by payment staff in approving new tech application, or implementing a National Coverage Decision; effective in following quarterly update	January 1	April 1	July 1	October 1	
Ambulatory Surgical Centers	Payments	CMS must implement new ASC payment system by Jan. 1, 2008			Congress could increase payment rates	
	Last interim final list of covered procedures published		May 4, 2005			
	Final list implemented			July 5,		

Site-of-Service or Benefit Category	Event	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Following Year
				2005		
CPT coding (HCPCS I)– for use by physicians, outpatient units & ambulatory facilities	Annual process to edit, add & delete codes conducted by the American Medical Association with input from a board representing specialty organizations, Editorial Panel meets 3 times per year	Feb. 9-12, 2006 (Last mtg for approved codes to be in 2007 CPT Book)	June 8-11, 2006 (Codes approved will be in 2008 CPT Book)		Oct., 12-15, 2006 (Codes approved will be in 2008 CPT Book)	Feb. 8-11, 2007 (Codes approved will be in 2008 CPT Book)
	Deadline for CPT applications for CPT 2007 or 2008 (effective January 1)	Mar. 8, 2006 for Jun 8, 2006 Editorial Panel Meeting		July 12, 2006 for Oct. 12, 2006 Editorial Panel Meeting	Nov. 7, 2005 for Feb. 9, 2006 Editorial Panel Meeting	Nov. 8, 2006 for Feb. 8, 2007 Editorial Panel Meeting
	Relative Value Update Committee (RUC) meeting to assign work values to new CPT codes	Feb. 2, 2006, for new CPT codes approved in Oct. 2005	April 27, 2006, for new CPT codes approved in Feb. 2006.		Oct. 5, 2006 for new CPT codes approved in June 2006	Feb. 1, 2007 for new CPT codes approved in Oct. 2006
	RUC 5-year Review Special Meeting (not open to the public)			August 25, 2005		
	CPT Symposium, Chicago				November 17-18, 2005	
Physician Payment	Physician Fee Schedule - Resource Based Relative Value Scale (RBRVS) - Notice of Proposed Rulemaking: annual update			Usually July with 60-day comment period		
	Physician Fee Schedule – Final Rule				November	
	Physician Fee Schedule – Implementation	January 1				January 1

Site-of-Service or Benefit Category	Event	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Following Year
	Practicing Physician Advisory Council (PPAC), meets quarterly	Feb./Mar.	May	August	November	
Clinical Laboratory Tests Payment	Public meeting to receive comments on whether payment for new CPT codes for clinical lab tests should be determined by cross-walking to existing codes or gap-filling by the Medicare contractors.			July		
	Proposed new code cross-walk or gap-fill determination posted				September	
	Payment amounts for new codes released in CMS program transmittal to contractors	Effective January 1			November	Effective January 1
HCPCS II – Coding for Durable Medical Equipment, Prosthetics, Orthotics, Medical & Surgical Supplies, and Administered Drugs	Annual review cycle for establishing new codes. Applications for administered drugs may be submitted as soon as they have FDA approval. Devices and other products must be on the market for at least 3 months.	Applications due by January 3				
	Public meetings to review coding applications and accept public oral and written comments.		June			
	Publication of new codes.	Jan. 1			Nov.	Jan. 1
DMEPOS Fee Schedule	Assignment of products to codes, and certain new codes updated quarterly and annually.	January 1	April 1	July 1	Oct 1	
Competitive Bidding for DME	Proposed rules to describe the program established by the Medicare Prescription Drug Improvement & Modernization Act (Medicare Modernization Act – MMA)			Summer 2005		

Site-of-Service or Benefit Category	Event	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Following Year
	Proposed Quality Standards for DMEPOS suppliers			Sept. 23, 2005 draft quality standards available for 60-day comment period	Nov. 28, 2005, comments on quality standards due	
Coverage Policies & Meetings	Variable. Open meetings and meetings of the Medicare Coverage Advisory Committee convened as needed. Proposed guidance documents and actions on national coverage determinations posted to the CMS website as developed with 30-day comment period.					
	MCAC meeting on age-related macular degeneration				Nov. 29, 2005	

## **Internet Resources for Coverage, Coding & Payment**

Medicare Index: [www.cms.hhs.gov/home/medicare.asp](http://www.cms.hhs.gov/home/medicare.asp)

CMS Coverage: [www.cms.hhs.gov/center/coverage.asp](http://www.cms.hhs.gov/center/coverage.asp)

### **Coding**

- CMS resources
  - ICD-9: [www.cms.hhs.gov/ICD9ProviderDiagnosticCodes/](http://www.cms.hhs.gov/ICD9ProviderDiagnosticCodes/)
  - HCPCS: [www.cms.hhs.gov/MedHCPCSGenInfo/](http://www.cms.hhs.gov/MedHCPCSGenInfo/)
- AMA CPT resources
  - [www.ama-assn.org/ama/pub/category/3113.html](http://www.ama-assn.org/ama/pub/category/3113.html)

### **Payment**

- Physician, DME, clinical lab fee schedules
  - [www.cms.hhs.gov/FeeScheduleGenInfo/](http://www.cms.hhs.gov/FeeScheduleGenInfo/)
- Hospitals and other facilities
  - [www.cms.hhs.gov/PropMedicareFeeSvcPmtGen/](http://www.cms.hhs.gov/PropMedicareFeeSvcPmtGen/)