

2020 Proposed Rule Update

EVERYTHING IS STILL “PROPOSED”



Ronald Hirsch, MD, FACP, CHCQM, CHRI

R1 RCM Inc.

Physician Advisory Solutions

The Good Stuff

PAs and NPs can supervise students and sign notes

New care management codes for PCPs

PAs no longer need direct supervision

No more blended E&M rate

back to 99202-99215, add on for extended

General supervision for all therapeutic services

Short Stay Audits

No RAC status audits of surgeries taken off IOL for a year

QIOs can audit and educate but not deny payment

The Bad Stuff

Price Transparency

- Post all prices in standardized manner

- Post negotiated prices for all services

- Post top 300 prices by common names

Monetary penalties up to \$100,000

More site neutral adjustments

The Bad Stuff

Take total hip arthroplasty off inpatient only list, assign to C-APC 5115

no discussion of status

CMS says 82% of TKAs in 2018 were inpatient (did not say that was the right rate)

not allowed at ASCs yet

The Bad Stuff

Allow TKAs in ASCs

Can not be expected to stay after MN

Will monitor for safety of pt selection

May require that TKAs already being done in facility

The Bad Stuff

Allow cardiac interventions in ASCs
stents, PTCA

Asking for comments on atherectomy,
stenting bypass graft, CTO,
thrombectomy

The Bad Stuff

Require Prior Auth 7-1-20 for

blepharoplasty- 49% increase in 2011

botulinum injections- 19% yrly increase

panniculectomy- 9% yrly increase

rhinoplasty- 1.9% yrly increase

vein ablation- 11% yrly increase

NO QUESTIONS!!!

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