

Coding Tip: Utilizing E/M CPT Code 99211 when performing COVID testing

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The SMFM Coding Committee has previously provided guidance regarding E/M encounters in the era of the COVID-19 pandemic (<https://www.smfm.org/covidcoding>). Recently many practices and labor & delivery units are moving to 'pre-testing' or screening for COVID-19 prior to scheduled cesarean section or induction of labor. We have previously advised that this encounter for a 'pre-screen' or 'pre-test' should be billed outside of the Global OB service. Prior to the pandemic, 99211 was limited to established patients only. **CMS has updated their rule**, noting that providers performing COVID-19 specimen collection could bill 99211 for new & established patients during the public health emergency. Please note there are new HCPCS codes that providers may have seen for COVID-19 collection (G2023, G2024), however these are for use by laboratories not medical practices or MFM providers. Supervision for the collection of the COVID-19 specimen can be provided via telehealth or virtual presence of the supervising physician for the duration of the public health emergency.

The AMA has developed a document with various scenarios when collecting COVID-19 specimens, including the use of the 99211, which is available here: <https://www.ama-assn.org/system/files/2020-05/covid-19-coding-advice.pdf>. In this document they also discuss the use of code 99000. CPT - 99000 is not often reimbursed, so in line with the new CMS rules, we recommend that MFM providers collecting COVID-19 swabs utilize the 99211 code. Please note that if a patient comes to the office for an E/M visit and is tested for COVID-19 in the office during the SAME visit, testing would be included as part of the performed E/M visit so 99211 should not be additionally billed. Only one E/M per patient, per day, per specialty will be covered. This concept remains in effect even if different places of services are used. However, if the COVID testing is done on the same day as a prenatal visit with anticipation that a global charge will be submitted for the pregnancy, the COVID testing visit may be billed as 99211 with modifier 25 to indicate that this is a separate identifiable service in addition to the pregnancy global.

SMFM Coding Committee ICD-10 coding guidance for COVID-19 and pregnancy can be found here (https://s3.amazonaws.com/cdn.smfm.org/media/2300/COVID19_Updated_Diagnosis_White_Paper_April2020.pdf) Applicable ICD-10 code for pre-testing would include O99.89 (other specified diseases and conditions complicated pregnancy) **plus** either Z11.59 (asymptomatic, no known exposure, results unknown) or Z20.828 (contact with COVID-19, suspected exposure).

Please note that while CMS has updated their rules and lifted certain restrictions, reimbursement is always payer specific and we recommend checking with each individual payer regarding their reimbursement policies. Rules may also change at the end of this public health emergency.

Case Examples:

1. A patient comes to the office for COVID-19 testing, a patient swab sample is collected in the office. Bill 99211.
2. A patient comes to the office for E/M visit and ultrasound study with the MFM provider, is tested for COVID-19 during the visit. A patient swab sample is collected in the office. If the prenatal visits are individually billed, the sample collection is included in the corresponding E/M charge for that visit. Do not bill 99211 in addition. However, if the pregnancy will be billed under global, the COVID collection visit may be billed with 99211 and attach -25 modifier to it to indicate that this is a separate identifiable visit from the pregnancy visits.
3. A patient comes to the office for an E/M visit with the MFM provider and returns 3 days later for COVID-19 testing, a patient swab sample is collected in office. Bill 99211 for the the COVID testing.
4. A patient comes to the office and is sent to an external lab site for COVID-19 testing. The external testing site may bill 99211 or may bill a lab based codes depending on the site of service.

Please submit any questions you may have to the SMFM Coding Committee: Ask a Coding Question website (<https://www.smfm.org/coding/questions/new>). Additional information and resources are also available on our coding website.

