

Coding Tip: Understanding Split/Shared Services and Incident to Services

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When deciding whether services are eligible for split/shared services or incident to billing, there are several factors that need to be taken into consideration:

1. Location
 - a. Split/shared services take place in the facility setting, and excludes office visits and nursing facilities.
 - b. Incident to billing takes place in the clinic or office setting.
2. Billing Provider
 - a. Split/shared services are billed out under the clinician providing the substantive portion (majority of total time, or substantive part of medical decision-making) of the E/M.
 - b. Incident to services are rendered by the nonphysician practitioner who is following an established plan of care, under the direct supervision of the billing physician.
3. Services Rendered
 - a. Split/shared services are only applicable to E/M services.
 - b. Incident to billing is applicable to services and supplies that are part of the patient's normal course of treatment.
4. Physician Involvement
 - a. Split/shared services are when both physician and nonphysician practitioners participate in the rendering of the E/M service.
 - b. Incident to services do not require that the physician personally render a service. The physician is immediately available and provides direct supervision (present in the office suite to render assistance as needed). The physician's ongoing participation in the patient's care must also be documented.

It is important to note that the information above is based on CMS rules and guidelines. Payers may or may not elect to follow these guidelines, so understanding the nuances of each payer contract is important. Please be aware that when billing directly under an advanced practitioner, some payers may reimburse a percentage of the allowable rate, rather than the full contracted rate. Additional information can be obtained at the following links:

- [12/30.6.18/ Split \(or Shared\) Visits](#)
- [Incident To Services & Supplies](#)
- [MLN Matters Number: SE0441- "Incident to" Services](#)
- [Section 2050.1, Incident to Physician's Professional Services](#)

Members should submit any coding questions to the SMFM Coding Committee Ask a Coding Question website (smfm.org/ask-a-coding-question). Additional information and resources are also available on our coding website. Thank you very much.