HCA✛ Healthcare™

DEPARTMENT: Regulatory Compliance Support	POLICY DESCRIPTION: Coding and Billing Helpline for Non-Hospital Entities
PAGE: 1 of 3	REPLACES POLICY DATED: 10/11/99, 9/1/02 (HIM.PHY.004), 3/1/06 (GOS.OSG.004), 3/6/06, 7/1/09, 10/15/10, 1/1/18
EFFECTIVE DATE: May 1, 2018	REFERENCE NUMBER: REGS.OSG.004
APPROVED BY: Ethics and Compliance Policy Committee	

SCOPE: All personnel responsible for performing, supervising or monitoring coding/claims processing for non-hospital entities:
Administration
Ambulatory Surgery Division (ASD)
Ethics and Compliance Officer
HCA Physician Services Group (PSG)
Practice Management, operations, and coding/billing staff
Owned Freestanding Outpatient Centers (*i.e.*, ASC, IDTF, physician directed clinics, clinical offices, radiation oncology, catheterization lab)
Employed Physicians, non-physician practitioners and physicians at teaching hospitals
Shared Services Centers (SSC)

PURPOSE: To provide quality advice for complete, accurate and consistent coding and billing related to ICD-10-CM, CPT and HCPCS Level II code assignments for federally funded programs.

POLICY: The Coding and Billing Helplines at http://trinisys.app.medcity.net/regshelpline should be utilized to provide consistent answers and/or advice regarding coding and billing questions.

To assist in providing quality advice for complete, accurate and consistent coding, the 3M Nosology Coding Help Line, operated by 3M Nosology staff, is available to all company-affiliated non-hospital entities that purchase a yearly subscription.

PROCEDURE:

1. Questions requiring assistance related to ICD-10-CM diagnosis or procedure codes, CPT/HCPCS Level II procedure codes or sequencing/linking,will be referred as follows:
    a) Non-hospital entities with a 3M Nosology yearly subscription, and with questions requiring external assistance related to ICD-10-CM diagnosis or procedure codes, CPT procedure codes or sequencing/grouping, should contact 3M Nosology via electronic submission, to the Coding Helpline operated by the 3M Nosology staff through the 3M HIS Support website at https://support.3mhis.com..
    b) Non-hospital entities without a 3M Nosology yearly subscription should email the *Regs* Helpline via Outlook at Regs Helpline at http://trinisys.app.medcity.net/regshelpline.
    c) Questions requiring assistance related to topics other than coding should be directed to the Regs Helpline at http://trinisys.app.medcity.net/regshelpline.

2. Questions or issues related to Regulatory Compliance Support policies and procedures should be directed to the Regs Helpline at http://trinisys.app.medcity.net/regshelpline.

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3. The following information should be provided when submitting a question to the Regs Helpline at http://trinisys.app.medcity.net/regshelpline: the name of the requestor, the entity name, COID#, city, state, and telephone number including area code.

4. All Nosology questions must be submitted online through the 3M HIS Support website at https://support.3mhis.com.

5. Business hours for the Nosology Services team are Monday – Friday from:
    4:30 a.m. – 5:30 p.m. Pacific Standard Time
    5:30 a.m. – 6:30 p.m. Mountain Standard Time
    6:30 a.m. – 7:30 p.m. Central Standard Time
    7:30 a.m. – 8:30 p.m. Eastern Standard Time

6. The nosologist and the requester will review the coding or grouping question submitted electronically. This may include, documentation uploaded from the chart and submitted via the 3M HIS Support website at https://support.3mhis.com. **All protected health information (PHI) must be removed** from the uploaded document (*i.e.*, patient name, account number, date of service, and medical record number). The nosologist will provide coding advice in response to the question. This coding advice should contain any reference to the AHA Coding Clinic, CPT Assistant or other references used by the nosologist to respond to the question.

7. Business hours for the Coding Helpline (i.e. Nosology Services team) are Monday – Friday from:
    4:30 a.m. – 5:30 p.m. Pacific Standard Time
    5:30 a.m. – 6:30 p.m. Mountain Standard Time
    6:30 a.m. – 7:30 p.m. Central Standard Time
    7:30 a.m. – 8:30 p.m. Eastern Standard Time

8. The nosologist and the requester will review the coding or grouping question submitted electronically. This may include, documentation uploaded from the chart and submitted via the 3M HIS Support website at https://support.3mhis.com. **All protected health information (PHI) must be removed** from the uploaded document (*i.e.*, patient name, account number, date of service, and medical record number). The nosologist will provide coding advice in response to the question. This coding advice should contain any reference to the AHA Coding Clinic, CPT Assistant or other references used by the nosologist to respond to the question.

9. If the requester does not agree with the advice received from 3M Nosology:
    a. Articulate the reason for disagreement and electronically submit a request for another opinion on the matter.

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b. Conclude the electronic exchange but retain the incident number, conduct additional research, and via electronic exchange contact the nosologist citing the incident number and request further assistance.

c. If the requester still disagrees with the nosologist's advice, request electronically to have the question reviewed by a Nosology supervisor.

d. If there is still disagreement with the advice being proposed by 3M Nosology after contacting the supervisor, contact the Regs Helpline via Regs Helpline at http://trinisys.app.medcity.net/regshelpline.

e. Supply the following information:
   - The date of follow up with the 3M Nosology supervisor to discuss or review of the disagreement with the advice provided.
   - The advice the 3M Nosology supervisor provided, including the incident number.
   - The reason for the coding disagreement/need for clarification.
   - The code(s) the requester thinks should be assigned in this case.
   - Site any references researched that led to the code assigned.

f. The Requestor has the responsibility for final decisions.

g. One question, with one account number, may be submitted per request to the Regs Helpline. Additional cases (i.e. account numbers) should be submitted as separate request(s).

10. For CPT coding questions that 3M Nosology is unable to answer, contact the Regs Helpline via Regs Helpline at http://trinisys.app.medcity.net/regshelpline.

a. Discuss the question and research performed and advise the Helpline that 3M Nosology was unable to provide an answer.

b. The Regs Helpline will either provide an answer or submit the question to the American Medical Association for clarification.

11. Regulatory Compliance Support will conduct routine quality control reviews of the coding advice logs provided by 3M Nosology and the *Regs* Helpline, including the response times for recorded questions.

12. Any coding advice from 3M Nosology requiring further clarification will be discussed with the 3M Nosology staff. If *Regs* and 3M Nosology agree that inappropriate advice was provided to a caller/requester, 3M Nosology will contact the caller/requester to clarify the issue. This clarification will be recorded by *Regs* for future reference.

13. Recurrent coding questions will be addressed by *Regs* for continuous coding education to support complete, accurate, and consistent coding.