

DATA Integrity & Compliance BLOG

Mid-level Provider Services

Coding and billing for mid-level providers, NP/PAs, can seem like a daunting task. The reality is it is not difficult if you take time to understand the guidelines and develop practices to utilize these providers appropriately. Utilizing mid-level providers in conjunction with physicians is a very common practice and we will continue to see the increase in these setups in the future.

Prior to having mid-level providers perform any service there are a few steps you need to take:

1. **Credentialing:** Get your providers credentialed with all the insurance carriers the same as you would for a physician.
2. **Understand and Educate on Incident to and Split/Shared Billing:** There is a big difference between the two types of billing. If the requirements for either incident to or split/shared are not met those services must be billed under the mid-level themselves rather than the physician. This is why credentialing is so important. Please see our website, Industry News and Updates section for more info on incident to and split/shared. www.therybargroup.com.
3. **Develop Processes and Practices to Appropriately Capture Mid-level Services:** Generally speaking, the providers themselves are the only ones that know whether a service will qualify as incident to, split/shared, or independent (i.e. billed under the mid-level NPI). There is no way for anyone else to know without looking at the completed medical records and the schedules for that date of service.
4. **Understand that 85% is Acceptable:** There is sometimes a push to have mid-levels only work incident to or split/shared since Medicare only pays 85% of the physician fee schedule when services are billed under a NP or PA NPI. While it is true they pay 100% if the service is billed under the physician NPI, this isn't always a good thing. If you are truly performing services that qualify to be billed under the physician, it should be fine if you are audited. If the services don't qualify and you are audited, it won't be good. Be aware when billing mid-level services under a physician NPI you are increasing that physicians utilization rate with the payers. High utilizers have been a focus for Medicare carriers to initiate probe audits. If the probe shows issues they do a much larger audit. Trust me; this is not a fun process.
5. **People Cannot be in Two Places at Once:** One of the greatest benefits of having mid-level providers working with physicians is that it frees up physician time so they can provide other services. Take advantage of this opportunity. It better serves the patients and it relieves stress and pressure on the providers.

A practice that utilizes both physicians and mid-level providers can be a well-oiled machine that allows all involved sleep well at night if set up and maintained correctly. Or, it can be a jumbled up nightmare for all involved. It simply comes down to understanding and complying with all applicable requirements. If you need help sorting out your mid-level documentation, coding, and billing please give us a call or send us an email at llovett@therybargroup.com.