

# FAQ: data 2021 E/M rules



# Ordering and reviewing.

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*Ordering a test is included in the category of test result(s) and the review of the test result is part of the encounter and not a subsequent encounter. CPT 2021, page 14*

- When you order a unique test, it counts as a Category 1 credit for ordering
- Whether you review the results that day, the next day or at a subsequent visit, you do not get separate credit for the review

# Ordering and reviewing

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**“During a phone call with a patient, I ordered a lab test, and asked him to schedule an appointment for the next week. How is that credited for MDM?”**

- Credit Category 1, review of the results of a unique test on the day of the appointment.

# Crediting orders: 3/9/2021 change

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*The ordering and actual performance and/or interpretation of diagnostic tests/studies during a patient encounter are not included in determining the levels of E/M services when the professional interpretation of those tests/studies is reported separately by the physician or other qualified health care professional reporting the E/M service. **Tests that do not require separate interpretation** (eg, tests that are results only) and are analyzed as part of MDM do not count as an independent interpretation, **but may be counted as ordered or reviewed for selecting an MDM level.***

# Credit for ordering a test

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- If you order a lab test and your practice bills for it, you may count the order (Category 1 credit for one unique test)
- Don't also count the review of a unique test; the review is inherent in the order There is no independent interpretation of a test with results
- Independent interpretation is only allowed for tests with a professional and technical component

# In office diagnostic tests

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**“If we order a quick strep test, and bill for it, do we credit it as a unique test?”**

Yes, count a Category 1 credit for the order; the review is not counted in addition.

**“If we order a lipid and Lyme test, and do the lipid in house, and send the Lyme test out, what do we credit as a unique test?”**

Credit both as Category 1 tests for the order  
( per AMA revision 3/9/21)

# In office diagnostic tests

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**“We are a multispecialty group, and we have an office lab. If we do any labs in house, does this mean we can’t credit them?”**

Yes, since the AMA 3/9/2021 revision, you can credit these.

# Independent interpretation

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*“The interpretation of a test for which there is a CPT code and an interpretation or report is customary. This does not apply when the physician or other qualified health care professional is reporting the service or has previously reported the service for the patient. A form of interpretation should be documented, but need not conform to the usual standards of a complete report for the test.” CPT 2021, page 14*

# Independent interpretation

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- Test is identified by a CPT code
- An interpretation or report is customary—that is, there is a technical and a professional component
- This does not include a lab test that has results and isn't defined with a technical and professional component
- Clinician did not bill for the professional component
- Clinician views image, interprets it, and documents interpretation (does not need to be formal)

# Independent interpretation

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**“If we bill globally for a knee x-ray, and I look at the x-ray, what credit do I get?”**

No Category 1 credit for the order

No Category 1 credit for the review

No Category 2 credit for the independent interpretation

# Independent interpretation

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**“What if I look at the films we did (and billed for) in our office from two year ago? Can I credit an independent interpretation?”**

No Category 2 credit for the independent interpretation

You billed for the professional component when it was done, and following CPT rules, you cannot credit an independent interpretation.

# Independent interpretation

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**“What if I look at the chest x-ray or CT scan that was done at the hospital, and the interpretation billed by the radiologist?”**

Yes, take Category 2 credit for an independent interpretation of the test. Document what you saw on the image. A “radiology quality” report is not required.

# Partners

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**“What if I am reviewing my same specialty partner’s notes? Or, if I’m reviewing a test result my same specialty partner ordered?”**

Per the AMA’s webinars, do not credit a unique note for reviewing your same specialty partner’s note

Do not credit the test result ordered by your same specialty partner