



Podiatry Services - Routine Foot Care and Debridement of Nails

11/30/2023

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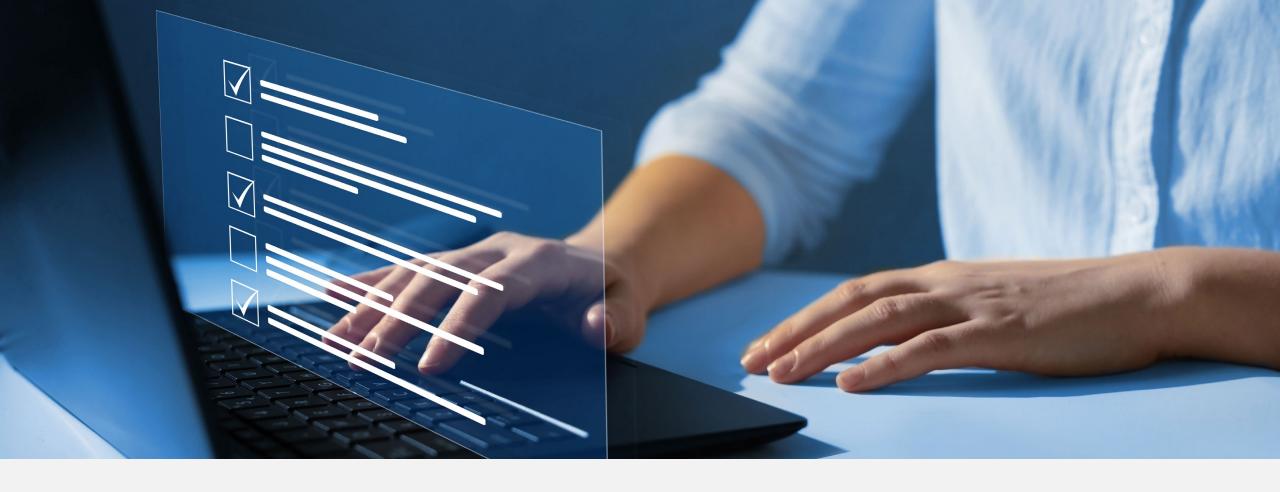
Today's Presenters



- Provider Outreach and Education, Consultants
 - Lori Langevin
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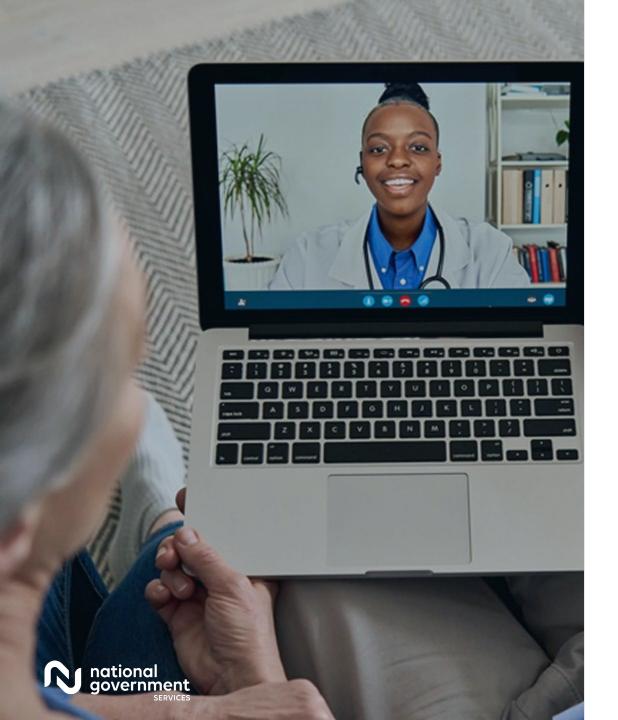


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Objective

To assist providers and their billing staff to have a better understanding of the routine foot care and debridement of nails local coverage determination and the related coverage article.



Agenda

Routine Foot Care LCD and Related Article

Billing Tips

E/M Modifiers

NCCI

Medical Review

Test Your Knowledge

Resources

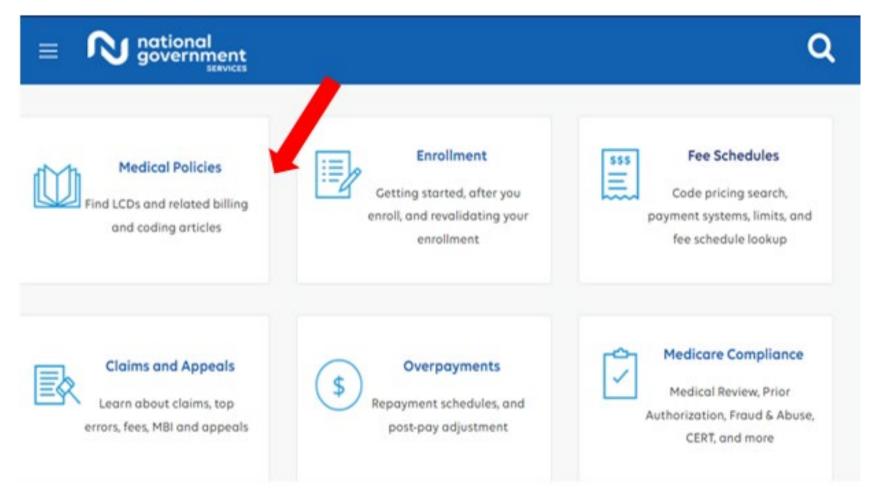






LCD for Routine Foot Care and Debridement of Nails (L33636) and Related Coverage Article (A57759)

Medical Policies





Medical Policies - LCDs







Medical Policies How to Search for LCDs

National Government Services Local Coverage Determinations

Welcome to Medical Policies. Below you will find the LCDs, related billing & coding articles and additional medical policy topics. When entering criteria into the search box, the search results will be conducted within the LCDs and the Medical Policy Articles shown below.

Please note: There are many procedures for which NGS does not have an LCD/Billing and Coding Article. If your search does not return any coverage documents, then NGS does not have a local coverage statement for that procedure.

For additional Medical Policy Topics, refer to the bottom of the page.

[View Draft Policies | View Future Effective LCDs | View Future Effective Billing & Coding Articles | National Coverage Determinations]



Search by LCD name, related items, LCD #, CPT/HCPCS Codes, and more

Local Coverage Determinations

Medical Policy Articles

Local Coverage Determinations

Routine Foot Care and Debridement of

Nails

Related terms: feet, toes, toenails,

L33636

A57759

11055, 11056, 11057, 11719, 11720, 11721, G0127

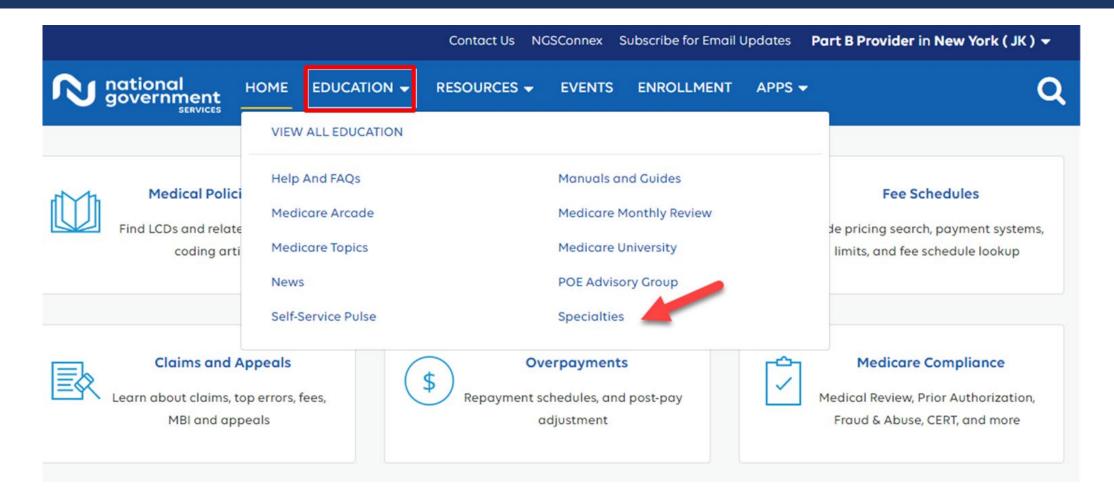
corns, calluses, trimming of nails,

systemic disease



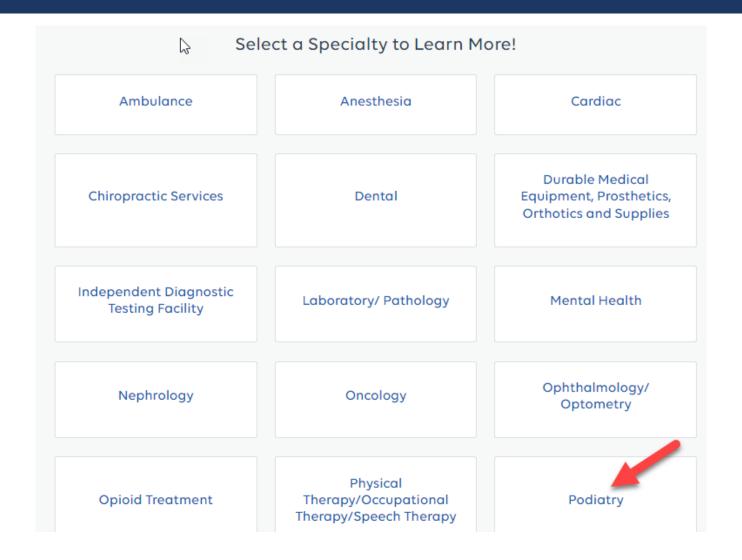


Podiatry Billing Guide Home Page





Podiatry Billing Guide Select Specialty







Podiatry Billing Guide

Education > Specialties

PODIATRY

Podiatry Manual

Introduction to Podiatry Services

Provider Qualifications

Podiatry Local Coverage Determinations

Podiatry National Coverage Determinations

Modifier Usage

Podiatry Coding Tips

Advance Beneficiary Notice of Noncoverage/National Correct Coding Initiative

Related Content

Related Articles

Podiatry Billing Guide

Introduction to Podiatry Services

Foot Care

A. Treatment of Subluxation of Foot

Subluxations of the foot are defined as partial dislocations or displacements of joint surfaces, tendons ligaments or muscles of the foot. Surgical or nonsurgical treatments undertaken for the sole purpose of correcting a subluxated structure in the foot as an isolated entity are not covered.

However, medical or surgical treatment of subluxation of the ankle joint (talo-crural joint) is covered. In addition, reasonable and necessary medical or surgical services, diagnosis or treatment for medical conditions that have resulted from or are associated with partial displacement of structures is covered. For example, if a patient has osteoarthritis that has resulted in a partial displacement of joints in the foot, and the primary treatment is for the osteoarthritis, coverage is provided.



Services Considered to be Components of Routine Foot Care

- Routine foot care generally not covered
 - Cutting or removal of corns and calluses
 - Clipping, trimming, or debridement of nails, including debridement of mycotic nails
 - Shaving, paring, cutting or removal of keratoma, tyloma, and heloma
 - Nondefinitive simple, palliative treatments
- Other hygienic and preventive maintenance care in the realm of self care
 - Cleaning and soaking the feet
 - Use of skin creams to maintain skin tone of both ambulatory and bedridden patients
 - Any services performed in the absence of localized illness, injury or symptoms involving the foot



Billing CPT/HCPCS Codes

Code	Description
11055	Paring or cutting of benign hyperkeratotic lesion (EG, corn or callus); single lesion
11056	Paring or cutting of benign hyperkeratotic lesion (EG, corn or callus); 2 to 4 lesions
11057	Paring or cutting of benign hyperkeratotic lesion (EG, corn or callus); More than 4 lesions
11719	Trimming of nondystrophic nails, any number
11720	Debridement of nails(s) by any method(s); 1 to 5
11721	Debridement of nails(s) by any method(s); 6 or more
G0127	Trimming of dystrophic nails, any number





Billing CPT/HCPCS Codes, Unit 1

- CPT Coding
 - Codes 11055, 11056, 11057, 11719, 11720, 11721 and G0127 should be billed with a unit of "1" regardless of the number of lesions or nails treated





Medicare Does Not Routinely Cover Fungus Cultures and KOH Preparations in Office

- Identification of cultures of fungi in the toenail clippings is medically necessary only
 - When it is required to differentiate fungal disease from psoriatic nail
 - When a definitive treatment for prolonged period of time is being planned involving the use of a prescription medication





Indications of Coverage - Systemic Disease

- Specific indications or exceptions under which routine foot care are program benefits
 - Systemic disease
 - ✓ Metabolic
 - ✓ Neurologic
 - ✓ Peripheral vascular disease
- Must be of sufficient severity that performance of such services by a nonprofessional person would put patient at risk



Indications of Coverage - Peripheral Neuropathy

- Coverage available for patients with peripheral neuropathy involving the feet, but without the vascular impairment as outlined in class B finding
 - Refer to group three or four paragraph and group three or four codes for those diagnoses where the patient has evidence of neuropathy, but no vascular impairment, for which class findings modifiers are not required





Indications of Coverage

- Services considered routine may be covered if they are performed as an integral part of otherwise covered services
 - Diagnosis and treatment of ulcers
 - Wounds
 - Infections
- Treatment of mycotic nails may be covered under the exceptions to the routine foot care exclusion (requires two DX)



Indications of Coverage - Warts

- Treatment of warts on the foot is covered to same extent as services provided for treatment of warts located elsewhere on body
- Removal of warts for cosmetic purposes or with at-home remedies is not covered through Medicare
 - If the beneficiary wishes one or more benign asymptomatic lesions removed for cosmetic purposes, the beneficiary becomes liable for the service(s) rendered





Mycotic Nails

- Treatment of mycotic nails may be covered under the exceptions to the routine foot care exclusion
- The class findings, or the presence of qualifying systemic illnesses causing a peripheral neuropathy, must be present and grant the presumption of coverage
- In the absence of a systemic condition, the following criteria must be met
 - In the case of ambulatory patients there exists
 - ✓ Clinical evidence of mycosis of the toenail, and
 - ✓ Marked limitation of ambulation, pain, or secondary infection resulting from the thickening and dystrophy of the infected toenail plate
 - In the case of nonambulatory patients there exists
 - ✓ Clinical evidence of mycosis of the toenail, and the patient suffers from pain or secondary infection resulting from the thickening and dystrophy of the infected toenail plate





Treatment of Mycotic Nails, Onychogryphosis or Onychauxis

- Codes: 11719, 11720, 11721 and G0127
- In the absence of a systemic condition or where the patient has evidence of neuropathy, but no vascular impairment, for which class findings modifiers are not required these ICD-10 CM codes must be reported as primary
 - B35.1 Tinea unguium
 - L60.2 Onychogryphosis
 - L60.3 Nail dystrophy
- The diagnosis representing the patient's symptom must be reported as the secondary ICD-10-CM code
 - Refer to Group 3 for the secondary ICD-10-CM codes required for coverage





Modifiers CMS 1500 Item 24D

- One of the modifiers listed below must be reported with codes 11055, 11056, 11057, 11719, G0127, and 11720 and 11721 when the coverage is based on the presence of a qualifying systemic condition, except where the patient has evidence of neuropathy, but no vascular impairment
 - Modifier Q7: One class A finding
 - Modifier Q8: Two class B findings
 - Modifier Q9: One class B finding and two class C findings





Class A Findings / Modifier Q7

- The presumption of coverage may apply when the physician rendering routine foot care has identified one class A finding
 - Nontraumatic amputation of foot or integral skeletal portion thereof





Class B Findings / Modifier Q8

- Two Class B findings are needed
 - Absent posterior tibial pulse
 - Absent dorsalis pedis pulse
 - Advanced trophic changes as evidenced by any three of the following (three required)
 - √ hair growth (decrease or absence)
 - ✓ nail changes (thickening)
 - ✓ pigmentary changes (discoloration)
 - ✓ skin texture (thin, shiny)
 - ✓ skin color (rubor or redness)





Class C Findings / Modifier Q9

- The presumption of coverage may apply when the physician rendering the routine foot care has identified one class B and two class C
 - Claudication
 - Temperature changes (e.g., cold feet)
 - Edema
 - Paresthesia's (abnormal spontaneous sensations in the feet)
 - Burning





Billing Tips to Avoid Costly Appeals

Specific Items to Look For

- ICD-10 codes that support medical necessity
 - There may be multiple groups of ICD-10 codes
 - It is important to read the narrative at the beginning of each ICD-10 group to understand which CPT codes apply to the list of ICD-10 codes





ICD-10 Codes that Support Medical Necessity

- Group 1 Paragraph
 - Codes: 11055, 11056, 11057, 11719, 11720, 11721 and G0127
- Group 1 Medical Necessity ICD-10 Codes Asterisk Explanation
 - * For these diagnoses, the patient must be under the active care of a doctor of medicine or osteopathy (MD or DO) for the treatment and/or evaluation of the complicating disease process during the six month period prior to the rendition of the routine-type service



Group 4 Paragraph

- 11055, 11056, 11057, 11719, 11720, 11721 and G0127
- The ICD-10-CM codes in the Group 4 paragraph represent those diagnoses where the patient has
 - Evidence of neuropathy
 - No vascular impairment
 - Class findings modifiers are not required
 - ✓ Refer to LCD in Group 4 codes





Claim Submission Requirements

- Date last seen by primary physician
 - The approximate date when the beneficiary was last seen by the MD/DO who diagnosed the complicating condition must be reported in an eight-digit format in Item 19 of the CMS-1500 claim form or the electronic equivalent





Billing Tips

- Procedure codes may be subject to NCCI edits, prior to billing Medicare refer to <u>CMS National Correct Coding Initiatives Edits</u>
- A claim submitted without a valid ICD-10-CM diagnosis code will be returned to the provider as an incomplete claim under Section 1833(e) of the Social Security Act
- The diagnosis code(s) must best describe the patient's condition for which the service was performed
- For diagnostic tests report the result of the test if known; otherwise the symptoms prompting the performance of the test should be reported





Billing Tips - ABN

- ABN guidelines
 - An ABN may be used for services which are likely to be noncovered, whether for medical necessity or for other reasons
 - ✓ Refer to <u>CMS IOM Publication 100-04, Medicare Claims Processing Manual, Chapter 30</u>, for complete instructions
 - MLN® Educational Tool: <u>Advance Beneficiary Notice of Non-coverage Interactive</u> Tutorial - ICN MLN909183





Issuing a Voluntary Advance Written Notice of Noncoverage as a Courtesy

- You are not required to notify the beneficiary before you furnish an item or service Medicare never covers or is not a Medicare benefit
- As a courtesy, you may issue a voluntary notice to alert the beneficiary about their financial liability
- Issuing the notice voluntarily has no effect on financial liability, and the beneficiary is not required to check an option box or sign and date the notice
 - MLN® Booklet Items & Services Not Covered Under Medicare





Documentation Requirements

- Refer to the LCD for documentation requirements specific to the service being rendered and billed
- Document physical and/or clinical findings consistent with the diagnosis and indicative of severe peripheral involvement
- Physical findings and services must be precise and specific (e.g., left great toe, or right foot, 4th digit)
- Documentation of coexisting systemic illness should be maintained





Utilization Guidelines

- Routine foot care services are considered medically necessary once in 60 days
- More frequent services will be considered not medically necessary
 - 60-day calculations are available
 - ✓ Podiatry Calculator
- Services for debridement of more than five nails in a single day may be subject to special review





Global Surgery Rules

- The global surgery rules will apply to routine foot care procedure codes 11055, 11056, 11057, 11719, 11720, 11721 and G0127
- As a result, an E/M service billed on the same day as a routine foot care service is not eligible for reimbursement unless the E/M service is a significant separately identifiable service, indicated by the use of modifier 25, and documented by medical records
- If the patient has evidence of neuropathy but no vascular impairment, the use of class findings modifiers is not necessary





How Providers Can Avoid Costly Appeals

- Verify procedure code (s) are appropriate based on medical records
- Use modifiers when applicable
- Number of service(s) and billed amount for each service is correct
- Date last seen by primary physician
 - The approximate date when the beneficiary was last seen by the MD/DO who diagnosed the complicating condition must be reported in an eight-digit format in Item 19 of the CMS-1500 claim form or the electronic equivalent
- NPI of the attending physician
 - The NPI of the attending physician must be reported in Item 19 of the CMS-1500 claim form or the electronic equivalent
 - If this information is not entered on the CMS-1500 claim form/electronic equivalent, it is considered "missing information" and the claim will be returned as unprocessable which assigns responsibility to the provider (CO)
- Use the Extra Narrative Data segment (Loop 2300/2400) of the ANSI ASC X12 837 Versions of an electronic claim when needed
- Verify primary payer data



E/M and Modifier 25

E/M and Modifier 25

- Use of modifier 25 indicates a significant, separately identifiable E/M service by the same physician on the same day of the procedure or other therapeutic service
 - Patient's condition required significant, separately identifiable E/M service
 - Service was above/beyond usual pre/postoperative care associated with procedure
 - Service performed by same physician same day as procedure
- 25 modifier always follows E/M code
- E/M services are built into the fee components of minor surgical procedures



Criteria For Proper Use of The 25 Modifier

- Both services must be significant, separate and distinct
- In general, Medicare considers E/M services provided on the day of a procedure to be part of the work of the procedure, and as such, does not make separate payment





Appropriate Use of Modifier 25

Example - Appropriate Use

- A patient is scheduled by the podiatrist to take care of a fibrous hamartoma. During the visit, the patient indicates they've had numbness and oozing from a lesion on the heel. The podiatrist evaluates the lesion, determines that it is a diabetic ulcer and treats it appropriately.
- In this case the heel lesion is considered a separate and significant service.



Inappropriate Use of Modifier 25

Example - Inappropriate Use

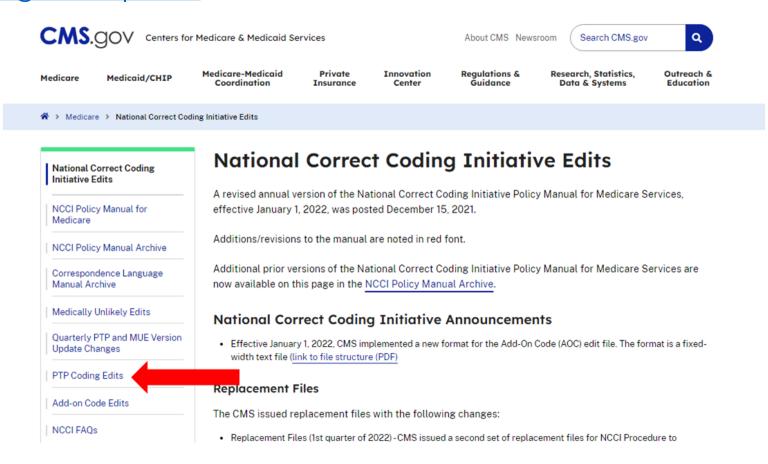
- An established patient is seen in the office for debridement of mycotic nails. In the course of examining the feet prior to the procedure, Tinea Pedis is noted. Use of previously prescribed topical cream to treat the Tinea is recommended.
- In this case, the Tinea was noted incidentally in the course of the evaluation of the mycotic nails and did not constitute a significant and separately identifiable E/M service above and beyond the usual pre and post care associated with nail debridement.





Where to Find NCCI Edits

PTP Coding Edits | CMS





National Correct Coding Initiative Example 1

Column 1	Column 2	*= In existence prior to 1996	Effective Date	Deletion Date *= no data	Modifier 0=not allowed 1=allowed 9=not applicable
A	В	С	D	E	F
11720	99347	N/A	19990101	*	1
11720	99348	N/A	19990101	*	1
11720	99349	N/A	19990101	*	1
11720	99350	N/A	19990101	*	1
11720	99354	N/A	19990101	*	1
11720	99355	N/A	19990101	*	1
11720	99356	N/A	19990101	*	1
11720	99357	N/A	19990101	*	1



National Correct Coding Initiative Example 2

Column 1	Column 2	*= In existence prior to 1996	Effective Date	Deletion Date *= no data	Modifier 0=not allowed 1=allowed 9=not applicable
Α	В	С	D	E	F
11719	G0127	N/A	19980401	*	0
11719	G0168	N/A	20010701	*	1



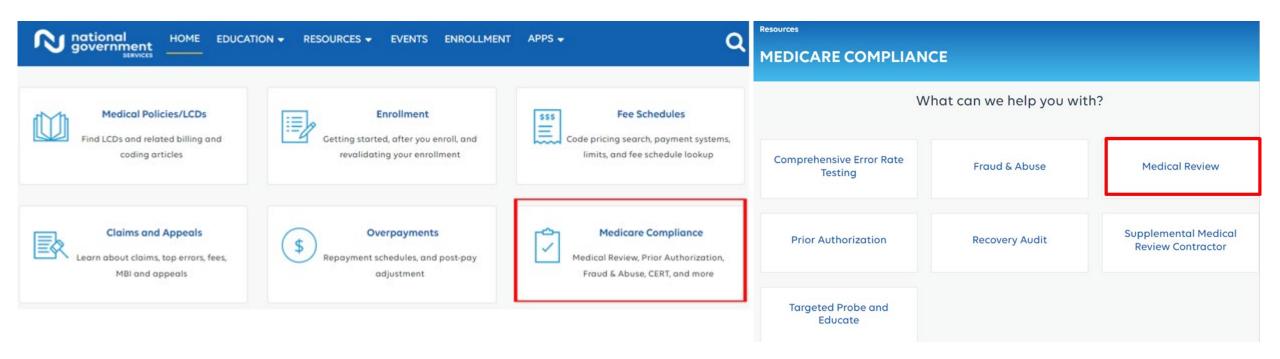
Modifier 59 Distinct Procedural Service

- Used to identify procedures/services, other than E/M services, that are not normally reported together, but are appropriate under the circumstances
- Most widely used modifier
- Last modifier of choice
- Providers incorrectly consider this to be the modifier to bypass NCCI
- Associated with a significant amount of abuse cases and high levels of manual audit activities



Medical Review

Medical Review





Medical Review Process





Test Your Knowledge

Test Your Knowledge One and Two

- 1. Routine foot care is generally not covered for the following
 - a. Cutting or removal of corns and calluses
 - b. Clipping, trimming, or debridement of nails, including debridement of mycotic nails
 - c. Shaving, paring, cutting or removal of keratoma, tyloma, and heloma
 - d. Nondefinitive simple, palliative treatments
 - e. All of these
- 2. Treatment of mycotic nails may be covered under the exceptions to the routine foot care exclusion.
 - a. True
 - b. False





Test Your Knowledge Three and Four

- 3. An E/M service billed on the same day as a routine foot care service is not eligible for reimbursement unless the E/M service is a significant separately identifiable service, indicated by the use of modifier 25, and documented by medical records.
 - a. True
 - b. False
- 4. Procedure codes 11055, 11056, 11057, 11719, 11720, 11721 and G0127 should be billed with the number of units that match the number of lesions or nails treated.
 - a. True
 - b. False



Test Your Knowledge Five and Six

- 5. Modifier Q7, Q8 or Q9 must be reported with codes 11055, 11056, 11057, 11719, G0127, and with codes 11720 and 11721 when the coverage is based on the presence of a qualifying systemic condition EXCEPT where the patient has evidence of neuropathy, but no vascular impairment, for which class findings modifiers are not required.
 - a. True
 - b. False
- 6. For ICD-10-CM codes which fall under the active care requirement, the approximate date when the beneficiary was last seen by the M.D. or D.O. who diagnosed the complicating condition (attending physician) must be reported in an eight-digit (MM/DD/YYYY) format in Item 19 of the CMS-1500 claim form or the electronic equivalent.
 - a. True
 - b. False



Test Your Knowledge Seven and Eight

- 7. The treatment of warts on the foot is never covered.
 - a. True
 - b. False
- 8. Routine foot care services are considered medically necessary once every 60 days.
 - a. True
 - b. False





Test Your Knowledge Nine and Ten

- 9. Which of the following metabolic, neurologic, and peripheral vascular diseases most commonly represent the underlying conditions that might justify coverage for routine foot care?
 - a. Diabetes mellitus
 - b. Arteriosclerosis obliterans
 - c. Buerger's disease
 - d. Peripheral neuropathies involving the feet
 - e. All of these
- 10. The global surgery rules do not apply to routine foot care procedure codes 11055, 11056, 11057, 11719, 11720, 11721 and G0127.
 - a. True
 - b. False



"What if" and Scenario Questions

- MACs cannot provide a definitive answer on whether Medicare would make payment for a service
 - MACs can only provide information on Medicare rules and regulations, the final determination is based on information contained in an individual patient's medical record
- MACs may not provide a preliminary medical review determination based on snippets of information or documentation
 - Final determination of payment is made after the submission of the claim and any medical review that may be performed
 - MACs will not grant prior approval or affirm a provider's individual practice's procedures, coding or documentation are sufficient to meet all Medicare guidelines
- Remember, providers are responsible for determining the correct diagnostic and procedural coding for the services furnished to Medicare patients
- After reviewing Medicare guidelines, providers, compliance, audit and/or billing staff can find more information on coding resources in <u>CMS IOM Publication 100-</u> <u>09, Medicare Administrative Contractor (MAC) Beneficiary and Provider</u> <u>Communications Manual, Chapter 6, Section 30.3.1</u>



Resources

- Medical Policy Center Part B
- LCD for Routine Foot Care and Debridement of Nails (L33636)
- Local Coverage Article for Billing and Coding: Routine Foot Care and Debridement of Nails (A57759)
- Local Coverage Article for Removal of Benign Skin Lesions (A54602)
- LCD Incision and Drainage (I & D) of Abscess of Skin, Subcutaneous and Accessory Structures (L33563)
- CMS IOM Publication 100-04, Medicare Claims Processing Manual, Chapter 12, Sections 30.6.1, 30.6.6, 30.6.14, 30.6.14.1 and 40.4
- Medicare Coverage Database
- PTP Coding Edits | CMS



Questions?

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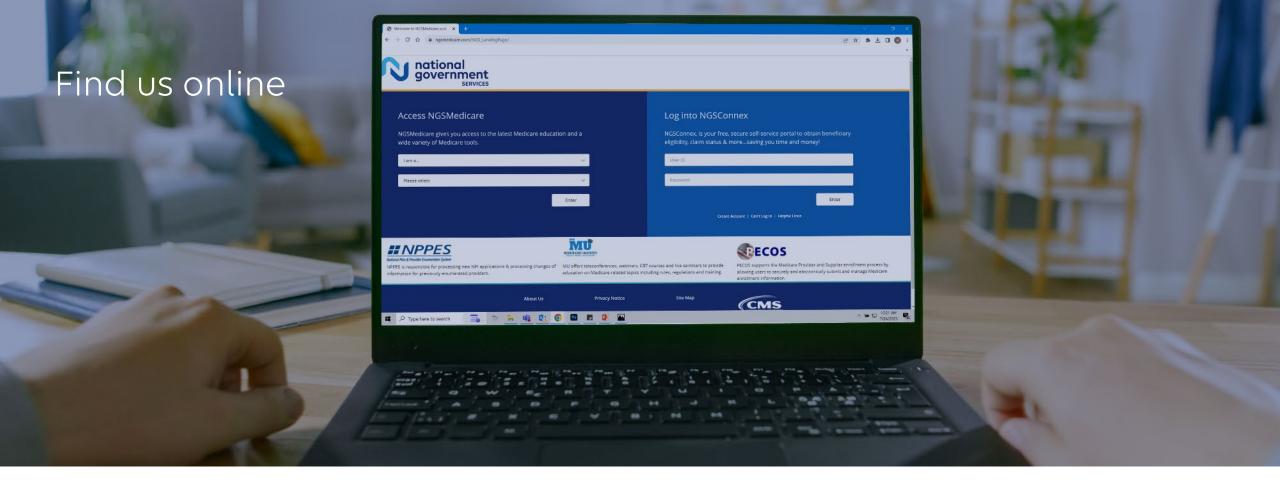


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