

# Podiatry Services – Routine Foot Care and Debridement of Nails

4/9/2025

**Closed Captioning:** *Auto-generated closed captioning is enabled in this course and is at best 70-90% accurate. Words prone to error include specialized terminology, proper names and acronyms.*

# Today's Presenters

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  - Lori Langevin





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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

- [Medical Policies/LCDs](#)
- [LCD for Routine Foot Care and Debridement of Nails \(L33636\) and Related Coverage Article \(A57759\)](#)
- [Billing Tips to Avoid Costly Appeals](#)
- [E/M and Modifier 25](#)
- [National Correct Coding Initiative](#)
- [Medical Review](#)
- [Test Your Knowledge](#)
- [Resources](#)

# Medical Policies/LCDs

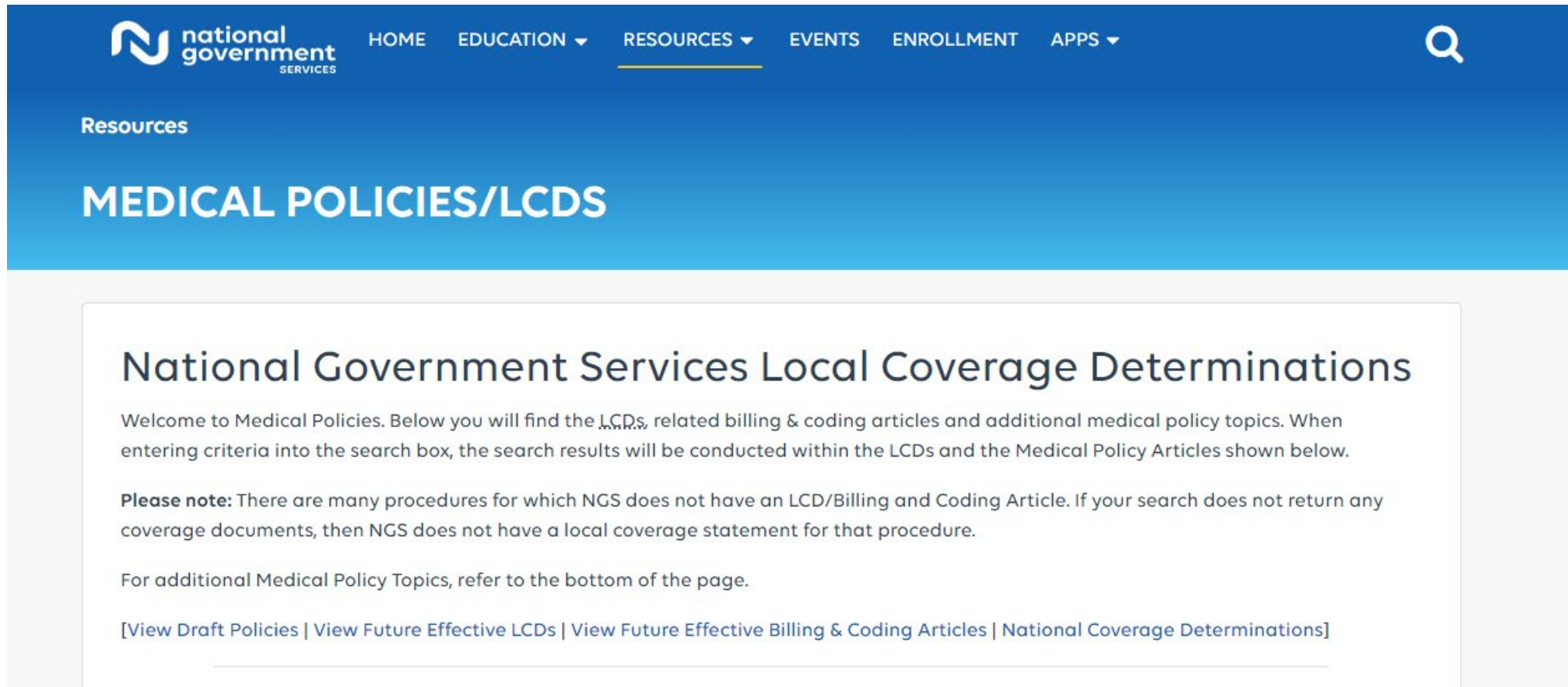
# Medical Policies

The screenshot displays the National Government Services website interface. At the top, there is a blue header with the logo and a search icon. Below the header, a grid of six service categories is shown. A red arrow points to the 'Medical Policies' category.

Category	Description
Medical Policies	Find LCDs and related billing and coding articles
Enrollment	Getting started, after you enroll, and revalidating your enrollment
Fee Schedules	Code pricing search, payment systems, limits, and fee schedule lookup
Claims and Appeals	Learn about claims, top errors, fees, MBI and appeals
Overpayments	Repayment schedules, and post-pay adjustment
Medicare Compliance	Medical Review, Prior Authorization, Fraud & Abuse, CERT, and more



# Medical Policies - LCDs



The screenshot shows the top navigation bar of the National Government Services website. The logo is on the left, followed by links for HOME, EDUCATION, RESOURCES (which is underlined), EVENTS, ENROLLMENT, and APPS. A search icon is on the right. Below the navigation bar, the page title "MEDICAL POLICIES/LCDS" is displayed in large, bold, white letters on a blue background. The main content area has a white background and contains the following text:

## 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](#)]



# 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.

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

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



Local Coverage Determinations    Medical Policy Articles

### Local Coverage Determinations

Routine Foot Care and Debridement of

Nails

*Related terms: feet, toes, toenails,  
corns, calluses, trimming of nails,  
systemic disease*

L33636

A57759

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

# Podiatry Billing Guide Home Page


The screenshot shows the National Government Services website home page. The top navigation bar includes links for 'Contact Us', 'NGSConnex', 'Subscribe for Email Updates', and 'Part B Provider in New York ( JK )'. The main navigation menu features 'HOME', 'EDUCATION', 'RESOURCES', 'EVENTS', 'ENROLLMENT', and 'APPS'. The 'EDUCATION' menu is expanded, showing a list of options: 'VIEW ALL EDUCATION', 'Help And FAQs', 'Medicare Arcade', 'Medicare Topics', 'News', 'Self-Service Pulse', 'Manuals and Guides', 'Medicare Monthly Review', 'Medicare University', 'POE Advisory Group', and 'Specialties'. A red arrow points to the 'Specialties' option. Below the navigation, there are several content cards: 'Medical Policies' (with an icon of an open book), 'Claims and Appeals' (with an icon of a document and a magnifying glass), 'Overpayments' (with a dollar sign icon), and 'Medicare Compliance' (with a clipboard icon). A 'Fee Schedules' card is also visible on the right side.

# Podiatry Billing Guide

## Select Specialty

Select a Specialty to Learn More!

Ambulance	Anesthesia	Cardiac
Chiropractic Services	Dental	Durable Medical Equipment, Prosthetics, Orthotics and Supplies
Independent Diagnostic Testing Facility	Laboratory/ Pathology	Mental Health
Nephrology	Oncology	Ophthalmology/ Optometry
Opioid Treatment	Physical Therapy/Occupational Therapy/Speech Therapy	Podiatry





# 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 v

### 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.

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

# 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



# Indications of Coverage

- Must be of sufficient severity that performance of such services by a nonprofessional person would put patient at risk
- Foot care services that do not require a professional would be considered routine and not a Medicare benefit
- Professional in this situation is defined as an M.D., D.O., D.P.M., nurse practitioner, clinical nurse specialist or physician assistant
- Foot care that would otherwise be considered routine may be covered when systemic condition(s) result in severe circulatory embarrassment or areas of diminished sensation in the individual's legs or feet

# Indications of Coverage

- Services considered routine may be covered if they are performed as a necessary and integral part of otherwise covered services, such as diagnosis and treatment of
  - Ulcers
  - Wounds
  - Infections
- The treatment of warts (including plantar warts) on the foot is covered to the same extent as services provided for the treatment of warts located elsewhere on the body

# Billing CPT/HCPCS Codes

- 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

# Indications of Coverage

- Specific indications or exceptions under which routine foot care are program benefits
  - Systemic disease
    - Metabolic
    - Neurologic
    - Peripheral vascular disease
- Documentation of the class findings supports these conditions

# 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 such as (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



# 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 findings
  - Refer to group four paragraph and codes for those diagnoses where the patient has evidence of neuropathy, but no vascular impairment, for which **class findings modifiers are not required**

# Mycotic Nails

- Treatment of mycotic nails or onychogryphosis or onychauxis may be covered under the exceptions to the routine foot care exclusion when one of the situations is present
  - Systemic conditions with adequate documentation of class findings and the use of the appropriate modifier, indicating the presence of qualifying systemic illnesses causing a peripheral neuropathy
  - Payment may be made for the debridement of a mycotic nail (whether by manual method or electrical grinder) when definitive antifungal treatment options have been reviewed and discussed with the patient at the initial visit and the physician attending the mycotic condition documents that the criteria are met
  - OR in the absence of a systemic condition, the following criteria on next slide must be met

# Mycotic Nail – Absence of Systemic Condition

- 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

# Routine Foot Care Services Performed by a Registered Nurse

- Effective for dates of service on or after 12/1/2023, a registered nurse that holds foot care certification (CFCN<sup>®</sup>) may perform covered foot care services when all the following requirements are met
  - Services are performed under direct supervision of a physician or other practitioner
  - All requirements of the “incident to” provision are met per the CMS Medicare Benefit Policy Manual
  - Proof of accredited foot care nurse certification must be included in the documentation
  - All other coverage provisions outlined in this Billing and Coding Article are met
- Providers should be aware that this may not be allowed, based on their state scope of practice laws



# Billing Tips

# Specific Items to Look For

- ICD-10 codes that support medical necessity
  - There may be multiple groups of ICD-10 codes
  - It's 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

# 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



# Claim Submission Requirements

- The beneficiary may have complicated diagnosis(es) that require them to be under the care of a primary physician for the disease that is causing the beneficiary to seek provider based routine foot care
- NPI of primary physician (must be a D.O. or M.D.) who made the diagnosis, and the approximate date of the last visit should be included in the record
  - 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 [CMS National Correct Coding Initiatives Edits](#)
- 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 [CMS IOM Publication 100-04, Medicare Claims Processing Manual, Chapter 30](#), for complete instructions
  - MLN® Educational Tool: [Advance Beneficiary Notice of Non-coverage Interactive 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<sup>®</sup> Booklet [Items & Services Not Covered Under Medicare](#)

# 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

# Documentation Requirements

- There must be adequate medical documentation to demonstrate the need for routine foot care services as outlined in this determination
- This documentation may be office records, physician notes or diagnoses characterizing the patient's physical status as being of such severity to meet the criteria for exceptions to the Medicare routine foot care exclusion
- The billed diagnoses should be reported with clinical findings
- There should be documentation of co-existing systemic illness
- The physical examination and findings must be precise and specific, with documentation of the location, appearance, characteristics and symptoms of the nails and/or lesion(s)
- The procedure note may reference the physical examination when describing the treatment(s) given during the procedure (e.g., left great toe, or right foot, 4th digit)

# Coding Examples

# Example 1

Date of Service	CPT/HCPCS	Modifier	Diagnosis	Item 19 – NPI of Primary Physician and Approximate Date of Last Visit
1/13/2025	11720	Q8	E08.59*	NPI# 10/22/2024

# Example 2

Date of Service	CPT/HCPCS	Modifier	Diagnosis	Item 19 – NPI of Primary Physician and Approximate date of Last Visit
1/22/2025	G0127	N/A	G60.0	N/A

# Example 3

Date of Service	CPT/HCPCS	Modifier	Diagnosis	Item 19 – NPI of Primary Physician and Approximate Date of Last Visit
1/31/2025	11721	N/A	L60.2 L60.0	N/A

# 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

- 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
  - Heel lesion is considered a separate and significant service
- Patient presents for a routine ingrown toenail removal, but during the examination, the podiatrist discovers a concerning skin lesion on the foot requiring further evaluation and discussion about potential biopsy options
  - Skin lesion on the foot is considered a separate and significant service
- Patient with diabetes comes in for a routine foot check, and during the exam, the podiatrist identifies a new area of significant foot ulceration requiring detailed assessment and treatment planning
  - Foot ulceration is considered a separate and significant service

# Inappropriate Use of Modifier 25

- 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
  - 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

# National Correct Coding Initiative

# Where to Find NCCI Edits

- [PTP Coding Edits](#)

The screenshot shows the CMS.gov website with the following structure:

- Header: CMS.gov Centers for Medicare & Medicaid Services. Navigation links: About CMS, Newsroom, Data & Research, and a search icon.
- Primary Navigation: Medicare (selected), Medicaid/CHIP, Marketplace & Private Insurance, Priorities, Training & Education.
- Breadcrumbs: Home > Medicare > Coding & billing > National Correct Coding Initiative (NCCI) edits > Medicare NCCI Procedure to Procedure (PTP) Edits.
- Left Sidebar (National Correct Coding Initiative (NCCI) edits):
  - Medicare NCCI Policy Manual
  - Medicare Correspondence Language Manual
  - Medicare NCCI Add-on Code Edits
  - Medicare NCCI FAQ Library
  - Medicare NCCI Medically Unlikely Edit (MUE) Archive
  - Medicare NCCI Medically Unlikely Edits (MUEs)
  - Medicare NCCI Procedure to Procedure (PTP) Edits (highlighted)
- Main Content Area:
  - Section Header: Medicare NCCI Procedure to Procedure (PTP) Edits (with a caduceus icon).
  - Text: National Correct Coding Initiative (NCCI) Procedure-to-Procedure (PTP) edits prevent inappropriate payment of services that should not be reported together. Each edit has a Column One and Column Two HCPCS/CPT code. If a provider reports the two codes of an edit pair for the same beneficiary on the same date of service, the Column One code is eligible for payment, but the Column Two code is denied unless a clinically appropriate NCCI PTP-associated modifier is also reported.
  - Section Header: Quarterly Version Update Changes.
  - Text: CMS posts changes to each of its NCCI PTP published edit files on a quarterly basis. This includes additions, deletions, and modifier indicator quarterly changes to PTP column one/column two correct coding edits and the PTP mutually exclusive code edits for Practitioners and Hospital Outpatient PPS in the Outpatient Code Editor.
  - Section Header: Related Downloads.
  - Text: 2024 Quarter 2 Edit Files:

# National Correct Coding Initiative Example 1

Column 1	Column 2	Effective Date	Modifier 0=not allowed 1=allowed 9=not applicable
11720	99347	19990101	1

# National Correct Coding Initiative Example 2

Column 1	Column 2	Effective Date	Modifier 0=not allowed 1=allowed 9=not applicable
11719	G0127	19980401	0



# Modifier 59 and the Subset Modifiers XE, XP, XS, XU

- Modifier 59 is used to identify distinct 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
- Modifier XE – Separate Encounter
  - A service that is distinct because it occurred during a separate encounter
- Modifier XP – Separate Practitioner
  - A service that is distinct because it was performed by a different practitioner
- Modifier XS – Separate Structure
  - A service that is distinct because it was performed on a separate organ/structure
- Modifier XU – Unusual Nonoverlapping Service
  - The use of a service that is distinct because it does not overlap usual components of the main service

# Medical Review

# Medical Review

**national government SERVICES** HOME EDUCATION RESOURCES EVENTS ENROLLMENT APPS

**Medical Policies/LCDs**  
Find LCDs and related billing and coding articles

**Enrollment**  
Getting started, after you enroll, and revalidating your enrollment

**Fee Schedules**  
Code pricing search, payment systems, limits, and fee schedule lookup

**Claims and Appeals**  
Learn about claims, top errors, fees, MBI and appeals

**Overpayments**  
Repayment schedules, and post-pay adjustment

**Medicare Compliance**  
Medical Review, Prior Authorization, Fraud & Abuse, CERT, and more

Resources

## MEDICARE COMPLIANCE

What can we help you with?

Comprehensive Error Rate Testing

Fraud & Abuse

**Medical Review**

Prior Authorization

Recovery Audit

Supplemental Medical Review Contractor

Targeted Probe and Educate

# Medical Review Process

The screenshot displays the National Government Services website. The top navigation bar includes links for HOME, EDUCATION, RESOURCES (highlighted), EVENTS, ENROLLMENT, and APPS. A search icon is located in the top right corner. Below the navigation bar, the breadcrumb trail reads 'Resources > Medicare Compliance'. The main heading is 'MEDICAL REVIEW'. On the left, a sidebar menu shows 'Medical Review' expanded to 'NGS Medical Review Process'. The main content area features the title 'NGS Medical Review Process' followed by two paragraphs of text. The first paragraph explains that Medicare contractors operate the medical review program to prevent improper payments and protect the Medicare Trust Fund. The second paragraph describes how medical review identifies errors through claim analysis and/or medical record review activities. A third paragraph provides information on where to find more details about the TPE program. On the right, a 'Helpful Resources' section lists 'Targeted Probe and Educate Manual', 'The preferred method to submit Medical Records is NGSConnex', 'NGSConnex', 'NGSConnex User Guide', and a link to the 'Contact Us' page for other submission methods.

**national government SERVICES** HOME EDUCATION ▼ RESOURCES ▼ EVENTS ENROLLMENT APPS ▼

Resources > Medicare Compliance

## MEDICAL REVIEW

Medical Review  
NGS Medical Review Process

### NGS Medical Review Process

Medicare contractors, like National Government Services, operate the medical review program to prevent improper payments and protect the Medicare Trust Fund. Medical reviews involve the collection and clinical review of medical records and related information to ensure that payment is made only for services that meet all Medicare coverage, coding, billing and medical necessity requirements.

Medical review identifies errors through claim analysis and/or medical record review activities. Contractors use this information to help ensure they provide proper Medicare payments (and recover any improper payments if the claim was already paid). Contractors also offer education to help ensure future compliance. A Medicare contractor may use any necessary information to make a claim review determination, including any documentation submitted with the claim or through an additional documentation request.

If you would like information about our TPE program, please visit the [TPE Home Page](#) and review our [Best Practices for a Successful Targeted Probe and Educate](#) article.

**Helpful Resources**

- [Targeted Probe and Educate Manual](#)
- The preferred method to submit Medical Records is NGSConnex:**
- [NGSConnex](#)
- [NGSConnex User Guide](#)
- Visit our [Contact Us](#) page for other methods of submission.

# Medical Review Target Probe and Educate (TPE)

- Program is designed to help providers and suppliers reduce claim denials and appeals through one-on-one help
- TPE reviews may involve claims that have already been processed (postpayment)
  - Notification letter will include a listing of all the claims being selected
- New claim submissions (prepayment)
  - Includes a notification letter followed by separate ADRs for each claim

# Target Probe and Educate (TPE)

**MEDICARE COMPLIANCE**

What can we help you with?

- Targeted Probe and Educate
- Comprehensive Error Rate Testing
- Fraud & Abuse
- Prior Authorization
- Supplemental Medical Review Contractor
- Recovery Audit
- Medical Review

Resources > Medicare Compliance

## TARGETED PROBE AND EDUCATE

- Targeted Probe and Educate
- 2024 Mental Health Enrollment Reminders
- Targeted Probe and Educate Educational Videos
- Medical Review: Targeted Probe and Educate Review Topics

### Targeted Probe and Educate Table of Contents

- Targeted Probe and Educate
- Key Elements of TPE
- Provider Tips
- Related Content

# Jurisdiction K Part B Targeted Probe and Educate: Medical Review Topics

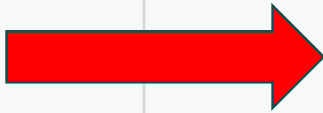
Topic	CPT Code(s)	Common Denials	Resources
Paring or Cutting of Benign Hyperkeratotic Lesion	11055, 11056, 11057	<p>A07 – The documentation does not support the medical necessity per policy guidelines.</p> <ul style="list-style-type: none"> <li>The documentation does not include some or all of the required elements including the necessary class findings, the presence of a qualifying systemic illness causing a peripheral neuropathy, and/or does not include precise and specific findings including specific location of lesion(s).</li> <li>The documentation does not support the class findings modifier billed.</li> </ul> <p>362 – The documentation does not support the medical necessity for the level of care billed. The reviewer recoded the service to a higher or lower level of care, depending on what the documentation supported.</p>	<p>Local Coverage Determination (LCD): L33636-Routine Foot Care and Debridement of Nails</p> <p>CMS IOM Publication 100-02, Medicare Benefit Policy Manual, Chapter 15, Section 290</p> <p>Title XVIII of the Social Security Act (SSA), Section 1833(e)</p> <p>Title XVIII of the SSA, Section 1862(a)(1)(A)</p>





# Jurisdiction K Part B Targeted Probe and Educate: Medical Review Topics

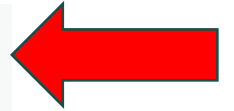
<p>Trimming of Nondystrophic Nails and/or Nail Debridement with or without an E/M code</p>	<p>11719, 11720, 11721, 99211-99215</p>	<p>B65 – Services not furnished directly to the patient and/or not documented.</p> <ul style="list-style-type: none"> <li>The documentation does not support that nondystrophic nails were present and/or treated.</li> </ul> <p>A07 – The documentation does not support the medical necessity per policy guidelines.</p> <ul style="list-style-type: none"> <li>The documentation does not support one or more of the medical necessity and/or documentation requirements as noted in the LCD.</li> </ul> <p>DA80 – The documentation does not support a significant, separately identifiable evaluation and management services on the same day as treatment of the nails.</p> <p>362 – The documentation does not support the medical necessity for the level of care billed. The reviewer recoded the service to a higher or lower level of care, depending on what the documentation supported.</p>	<p><a href="#">Local Coverage Determination (LCD): L33636-Routine Foot Care and Debridement of Nails</a></p> <p><a href="#">CMS IOM Publication 100-02, Medicare Benefit Policy Manual, Chapter 15, Section 30</a></p> <p><a href="#">CMS IOM Publication 100-04, Medicare Claims Processing Manual, Chapter 12, Section 30.6.6B</a></p> <p><a href="#">Title XVIII of the SSA, Section 1833(e)</a></p>
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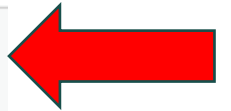
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<p>Paring or Cutting of Benign Hyperkeratotic Lesion</p>	<p>11055, 11057</p>	<p>A07 – The documentation does not support the medical necessity per policy guidelines.</p> <ul style="list-style-type: none"> <li>The documentation does not include some or all the required elements including the necessary class findings, the presence of a qualifying systemic illness causing a peripheral neuropathy, and/or does not include precise and specific findings including specific location of lesion(s).</li> <li>The documentation does not support the class findings modifier billed.</li> </ul> <p>362 – The documentation does not support the medical necessity for the level of care billed. The reviewer recoded the service to a higher or lower level of care, depending on what the documentation supported.</p>	<p>Local Coverage Determination (LCD): L33636 – Routine Foot Care and Debridement of Nails</p> <p><a href="#">CMS IOM Publication 100-02, Medicare Benefit Policy Manual, Chapter 15, Section 290</a></p> <p>Title XVIII of the Social Security Act (SSA), Section 1833(e)</p> <p>Title XVIII of the SSA, Section 1862(a)(1)(A)</p>
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# Jurisdiction 6 Part B Targeted Probe and Educate: Medical Review Topics

<p>Debridement of nails, any method; six or more when billed with or without an E/M code</p>	<p>11721 with or without E/M code</p>	<p>A07 – The documentation does not support the medical necessity per policy guidelines.</p> <ul style="list-style-type: none"> <li>• The documentation does not include precise and specific findings including specific nails that were debrided</li> <li>• The documentation does not specify which nails were debrided.</li> <li>• The documentation does not support a systemic disease, such as metabolic, neurologic, or peripheral vascular disease, of sufficient severity that performance of such services by a nonprofessional person would put the patient at risk.</li> <li>• The documentation does not support the class findings that were billed.</li> </ul> <p>B65 – Services not furnished directly to the patient and/or not documented.</p> <ul style="list-style-type: none"> <li>• The documentation does not support that nondystrophic nails were present and/or treated.</li> </ul> <p>362 – The documentation does not support the medical necessity for the level of care billed. The reviewer recoded the service to a higher or lower level of care, depending on what the documentation supported.</p>	<p>Local Coverage Determination (LCD): L33636 - Routine Foot Care and Debridement of Nails</p> <p>CMS IOM Publication 100-02, <i>Medicare Benefit Policy Manual</i>, Chapter 15, Section 30</p> <p>CMS IOM Publication 100-04, <i>Medicare Claims Processing Manual</i>, Chapter 12, Section 30.6.6B</p> <p>Title XVIII of the SSA, Section 1833 (e)</p>
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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 [CMS IOM Publication 100-09, Medicare Administrative Contractor \(MAC\) Beneficiary and Provider Communications Manual, Chapter 6, Section 30.3.1](#)

# Resources

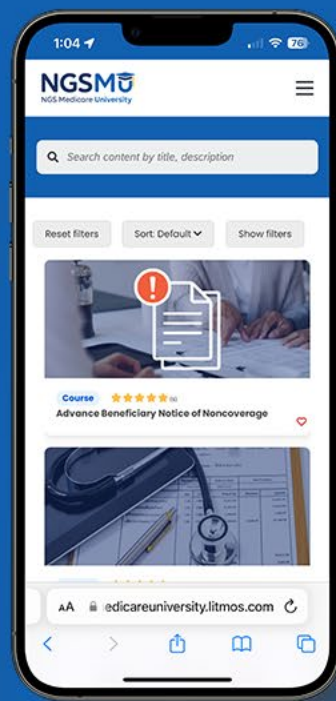
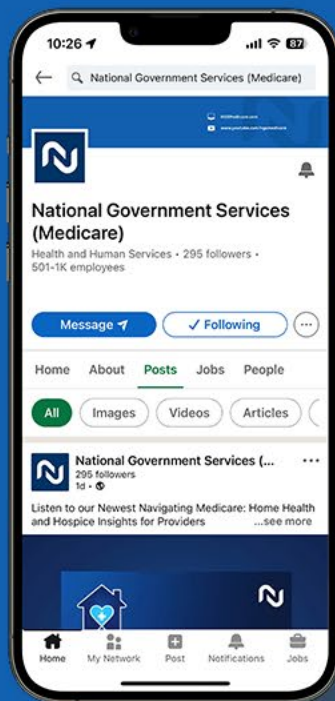
# Resources

- [Medical Policy Center](#)
- [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](#)



# Questions?

Thank you!



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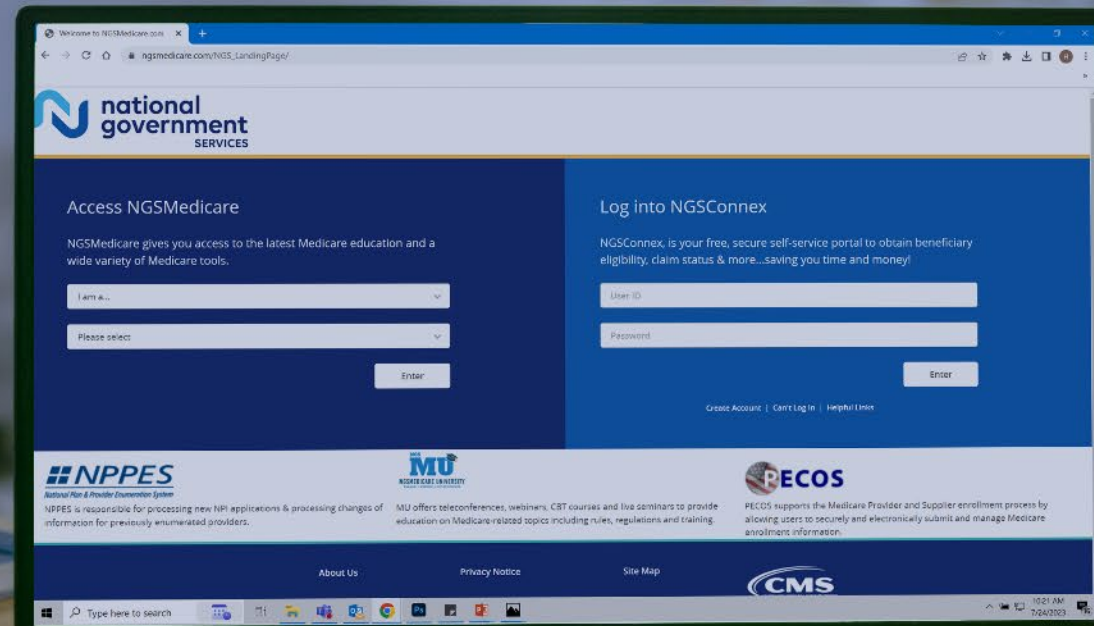


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