
Billing – Physician Services

Federal Regulations: 418.304	Effective Date: February 27, 2023
State Regulations: TX 97.254	Revision Date(s): February 27, 2023

PURPOSE: To ensure proper billing of physician services.

POLICY: Hospice may bill for professional services related to the terminal illness and related conditions for physicians with whom they have a relationship as either employed or contracted hospice physicians, or contracted consulting physicians.

DEFINITIONS

Professional Services: Those physician services that are separately billable to Medicare Part A or Part B and are designated by a particular CPT code.

Technical Services: Technical services do not directly involve the physician’s time but do have a corresponding CPT code. For example, these include the technical component of laboratory services, radiological services, costs of chemotherapy drugs. These services are considered a part of the hospice per diem rate and are not separately billable.

Administrative Services: These are medical director or hospice physician services included in the hospice per diem rate and are not separately billable.

- Participating in interdisciplinary group
- Certifying and recertifying patients
- Completing the face-to-face encounter
- Coordinating and reviewing care plans
- Involvement in quality assessment and performance improvement activities
- Educational activities to staff, community, and other professionals
- Medical director supervision of hospice physicians

PROCEDURE:

- 1) The professional services of a non-hospice attending physician for the treatment and management of care related to the terminal illness are not considered hospice services and are not billable by Hospice.
- 2) The non-hospice attending physician, if contracted with Hospice, may bill Hospice for technical services related to the terminal illness. Hospice cannot bill Medicare.
- 3) Professional services of hospice medical director or hospice physician related to the terminal illness may be billed by Hospice to Medicare Part A.
- 4) A consulting physician contracted with Hospice may bill Hospice for professional and technical services related to the terminal illness.
 - a) Hospice may bill Medicare Part A for professional services.
 - b) Hospice reimburses consulting physician per contract.