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MEMORANDUM

TO: Hospital Chief Financial Officers

FROM: Christopher N. Konsowski, Chief, Audit & Compliance

DATE: January 17, 2017

RE: Suggested Treatment of New Physical Therapy and Occupational Therapy CPT

Codes

It has come to the attention of the HSCRC staff that the Current Procedural Terminology (CPT) Editorial Panel has created new CPT codes to replace the current CPT codes for Physical Therapy (PTH) and Occupational Therapy (OTH) evaluation and re-evaluation procedures. The new codes (97161 – 97168) replaced the current codes (97001 – 97004) on January 1, 2017. The new PTH and OTH evaluation codes are not time based but are based on patient complexity, 97161 & 97165 low complexity, 97162 & 97166 moderate complexity, and 97163 & 97167 high complexity for PTH and OTH respectively. These replace 97001 and 97003. Re-evaluation codes, 97164 for PTH and 97168 for OTH, replaced 97002 and 97004 respectively.

This change to tiered patient complexity based CPT codes presents a problem for Maryland Hospitals, because the current Relative Value Units (RVUs) in Appendix D, Standard Units of Measure, of the HSCRC Manual are time based (15 minute increments). Therefore, in order to ensure revenue neutrality, staff suggests that Hospitals utilize the attached format for assigning RVUs "By Report" to the new CPT codes until new RVUs are officially approved. Staff reminds Hospitals that all new evaluation and re-evaluation codes will be reimbursed at the same levels by Medicare, therefore the RVUs assigned to these codes should reflect the current Appendix D methodology.

If you have any questions, please feel free to contact me at 410-764-2579 or via email to chris.konsowski@maryland.gov.