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Skilled Nursing Facility Consolidated Billing as It Relates to Clinical Social Workers

Provider Types Affected

Skilled Nursing Facilities (SNFs), physicians, practitioners, and clinical social workers (CSW)

Provider Action Needed

This Special Edition is an informational article that describes SNF Consolidated Billing (CB) as it applies to CSW services furnished to SNF residents during a Part A covered stay.

Background

When the SNF Prospective Payment System (PPS) was introduced in 1998, it changed not only the way SNFs are paid, but also the way SNFs must work with suppliers, physicians, and other practitioners. CB assigns SNFs the Medicare billing responsibility for virtually all of the services that the SNF's residents receive during the course of a covered Part A stay.

Payment for this full range of services is included in the SNF PPS global per diem rate. The only exceptions are those services that are specifically excluded from this provision, which remain separately billable to Medicare Part B by the entity that actually furnished the service. For a detailed overview of SNF CB and a list of the services excluded from SNF CB, see Medlearn Matters Special Edition SE0431 at:

http://www.cms.hhs.gov/medlearn/matters/mmarticles/2004/SE0431.pdf

Since CSW services do not currently appear on this excluded list, they are included within the overall package of services that is subject to the SNF CB requirement. Although the inclusion of CSW services under the SNF CB requirement does not preclude Medicare coverage for these services, it makes the SNF responsible for including them in its Part A bill for the resident's covered stay.

In fact, bundling CSW services in the Part A payment rate is not a new concept. The corresponding Medicare comprehensive billing requirement for inpatient hospital services, which similarly includes CSW services while excluding the services of certain other types of mental health professionals, has been in effect since 1983, and served as a model for SNF CB.

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Additional Information

See Medlearn Matters Special Edition SE0431 for a detailed overview of SNF CB. This article lists services excluded from SNF CB and can be found at:

http://www.cms.hhs.gov/medlearn/matters/mmarticles/2004/SE0431.pdf

Also, the Centers for Medicare & Medicaid Services (CMS) Medlearn Consolidated Billing Website can be found at:

http://www.cms.hhs.gov/medlearn/snfcode.asp

It includes the following relevant information:

- General SNF CB information;
- HCPCS codes that can be separately paid by the Medicare carrier (i.e., services not included in CB);
- Therapy codes that must be consolidated in a non-covered stay; and
- All code lists that are subject to quarterly and annual updates and should be reviewed periodically for the latest revisions.

The SNF PPS Consolidated Billing Website can be found at:

http://www.cms.hhs.gov/providers/snfpps/cb

It includes the following relevant information:

- Background;
- Historical questions and answers;
- Links to related articles; and
- Links to publications (including transmittals and Federal Register notices).

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