

## Non-Physician Practitioner (NPP) Services Nurse Practitioner (NP) and Physician Assistant (PA)

### Three Options to Bill Medicare

#### 1. "Incident to" Services

- Must be integral, although incidental part of the physician's personal professional service
- NP or PA may be an employee, independent contractor or a contractor under an indirect contractual arrangement
- Physician must first see patient and develop the plan of care the NP or PA will carry out
- Physician must remain active in patient's ongoing treatment
- Direct physician supervision is required
- Bill service under physician's name and number
  - o Medicare reimbursement 100% of MPFS amount

or

- Bill service under NP's or PA's name and number
  - o Medicare reimbursement 85% of MPFS amount
- "Incident to" not applicable to:
  - o Consultation services
  - o New patient office services (physician has not seen patient and established plan of care)

#### 2. Split/Shared Service

- Applies only to selected E/M visits and locations
- N/A to new patient visits, consultations, procedures and critical care services
  - N/A to services in the SNF or NF setting
  - Both a physician and NP or PA provide services in the **office setting** for the same encounter
  - "Incident to" criteria must be met
  - Bill service under physician's name and number
    - o Medicare reimbursement 100% of MPFS amount

or

  - Bill service under NP's or PA's name and number
    - o Medicare reimbursement 85% of MPFS amount

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  - Both a physician and NP or PA provide services in the **hospital inpatient, hospital outpatient, observation or emergency department** on the same day
  - "Incident to" not applicable in an institutional setting
  - Bill service under physician's name and number
    - o Medicare reimbursement 100% of MPFS amount

#### 3. NP's or PA's Name and Number

- Service performed by NP or PA
  - o Consultation services
  - o New patient services
  - o Established patient services
  - o Hospital outpatient services
  - o Hospital inpatient services
  - o Emergency Department services
  - o Other services
- Bill service under NP's or PA's name and number
  - o Medicare reimbursement 85% of MPFS amount

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*This information is general in scope and is intended to provide an overview of Medicare's guidelines regarding consultation services. For additional information, refer to your local Medicare carrier and CMS publications and website. We encourage recipients of this information to contact legal counsel for advice and direction on specific matters of concern.*