Compliance Alert
SIU SOM Office of Compliance and Ethics
Incident-To Services

Defined:
The MEDICARE term for service(s) that the nonphysician practitioner (NPP) provides under a supervising physician’s authority and is billed under the supervising physician’s NPI.

Requirements:
• Services may only be provided to an established patient with an established plan of care
• The service is provided under the supervising physician’s direct supervision

Direct Supervision:
• The physician whose name and NPI will be used for billing must be physically present in the office suite and immediately available to provide assistance and direction as necessary
• Ordering Physician/NPP does not need to be the Supervising Physician/NPP
• Who can supervise:
  o Physician defined as a physician or other practitioner (PA, NP, CNS, CNM, etc) authorized by the Act to receive payment for services incident to his/her own services.

Documentation:
• Details of services/supplies provided
• Name of supervising clinician in clinic on the date the service was provided
• The performing provider must sign and date report
• The supervising physician who the bill is submitted under must sign and date the report

Exclusions:
• The NPP cannot bill incident-to for the evaluation of a new patient
• Does not apply when the NPP sees an established patient for a new problem
• Does not apply when the established patient’s plan of care/treatment changes

Not Incident-To:
• Diagnostic Tests
• Clinical Lab Tests – Including Venipuncture
• Residents, Students
• Preventative Services (e.g. Glaucoma Screening)
• Pneumococcal, Influenza, and Hepatitis B
Illinois Medicaid:
Reimbursement for the practice expense of administering injections is included in the office visit when the participant sees a practitioner. If the participant is seen solely for the injection, the CPT code 99211 may be submitted to cover the injection service expense, and the specific vaccine product procedure code is to be submitted to cover the cost of the vaccine or the cost of obtaining it through VFC. Seasonal flu vaccinations follow these guidelines.

Sources:
Medicare University - The Ins and Outs of Incident-To Billing
Medicare Benefit Policy Manual Chapter 15
Medicare Claims Processing Manual Chapter 12
NGS Medicare “Incident to” Office Guidelines
SIU Office of Compliance Incident-To Training Presentation

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Questions regarding this Compliance Alert can be directed to:
Mary A. Curry, Health Care Compliance Officer, at mcurry@siu.edu or by calling 545-6012