The Centers for Medicare and Medicaid Services recently released MLN Matters article MM7631 to clarify Place of Service (POS) coding instructions. MM7631 establishes that all services--with two exceptions--paid under the MPFS that the POS code to be used by the physician and other supplier will be assigned as the same setting in which the beneficiary received the face-to-face service. There are two exceptions to this provision:

1. When a beneficiary is receiving care as a hospital inpatient
2. When a beneficiary is receiving care as a hospital outpatient

CMS also provided additional clarification on certain POS codes:
POS 15 – Mobile unit setting: If the mobile unit is serving an entity for which another POS code already exists, providers should use the POS code for that entity. However, if the mobile unit is not serving an entity which could be described by an existing POS code, the providers are to use the Mobile Unit POS code 15.

POS 21 – Inpatient Hospital: In the case of a physician/practitioner/supplier that provides services to a patient who is an inpatient of a hospital, the inpatient hospital POS code 21 will be used irrespective of the setting where the patient actually receives the face-to-face encounter.

POS 22 – Outpatient Hospital: Physicians/practitioners who perform services in a hospital outpatient department will use POS code 22 (Outpatient Hospital) unless the physician maintains separate office space in the hospital or on hospital campus and that physician office space is not considered a provider-based department of the hospital as defined in 42.C.F.R.413.65. Physicians will use POS code 11 (office) when services are performed in a separately maintained physician office space in the hospital or on hospital campus and that physician office space is not considered a provider-based department of the hospital as defined in 42.C.F.R.413.6. Use of POS code 11 (office) in the hospital outpatient department or on hospital campus is subject to the physician self-referral provisions set forth in 42.C.F.R.411.353 through 411.357.

POS 24 – Ambulatory Surgical Centers: Physicians/practitioners who perform services in a Medicare-participating ASC will use POS code 24 (ASC). Physicians are not to use POS code 11 (office) for ASC based services unless the physician has an office at the same physical location of the ASC which meets all other requirements for operating as a physician office at the same physical location as the ASC – including meeting the “distinct entity” criteria defined in the ASC State Operations Manual that precludes the ASC and an adjacent physician office from being open at the same time – and the physician service was actually performed in the office suite portion of the facility. Details of ASC information can be found in Appendix L of the ASC CMS Manual on the CMS website.
For additional details on the billing guidelines and a complete list of the POS codes paid at facility and non-facility rates, see MLN article MM7631 located at: http://www.cms.gov/MLNMattersArticles/Downloads/MM7631.pdf

CMS also recently released CR8125 to add a new POS code. The new code is 18 for Place of Employment/Worksite. The code’s description is as follows: “a location, not described by any other POS code, owned or operated by a public or private entity where the patient is employed, and where a health professional provides ongoing or episodic occupational medical, therapeutic or rehabilitative services to the individual.”

For additional information on this new POS code, see MLN article located at: http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/Downloads/MM8125.pdf

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