

Related Change Request (CR) #: 3458

MLN Matters Number: MM3458

Related CR Release Date: January 14, 2005

Related CR Transmittal #: 434

Effective Date: July 1, 2005

Implementation Date: July 5, 2005

Addition of CLIA Edits to Certain Health Care Procedure Coding System (HCPCS) Codes for Mohs Surgery

Note: This article was updated on February 4, 2013, to reflect current Web addresses. All other information remains unchanged.

Provider Types Affected

Physicians and clinical diagnostic laboratories billing Medicare carriers for Mohs Surgery

Provider Action Needed



STOP – Impact to You

The Mohs micrographic surgical treatment for skin cancer requires the trained physician to serve as pathologist and surgeon. The applicable HCPCS codes (17304, 17305, 17306, 17307, and 17310) include the physician microscopic exam and interpretation, which are characterized as high complexity tests under the Clinical Laboratory Improvement Amendments (CLIA). Thus, these HCPCS codes will be subject to CLIA edits.

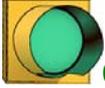


CAUTION – What You Need to Know

The Clinical Laboratory Improvement Amendments of 1998 (CLIA) require a facility to be appropriately certified for each test performed. The following types of facilities will not be permitted to bill for the above noted tests: those without a valid current CLIA certificate; those with a current CLIA certificate of waiver (certificate type code 2); OR those with a current CLIA certificate for provider-performed microscopy procedures (certificate type code 4)

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GO – What You Need to Do

Please stay current with requirements for the Mohs Micrographic Surgical procedure to ensure accurate claims processing. The Mohs micrographic surgery HCPCS codes (17304, 17305, 17306, 17307, and 17310) will require either: a CLIA certificate of registration (certificate type code 9), a CLIA certificate of compliance (certificate type code 1), OR a CLIA certificate of accreditation (certificate type code 3).

Background

The Clinical Laboratory Improvement Amendments of 1998 (CLIA) require a facility to be appropriately certified for each test performed. To ensure that Medicare and Medicaid pay only laboratory tests performed by certified facilities, each HCPCS code that includes a laboratory test is currently edited at the CLIA certificate level.

The Mohs surgery procedure usually includes the following steps:

- A physician generally removes the visible cancer, along with a thin layer of additional tissue;
- The removed tissue specimen is cut into sections, stained, and marked on a detailed diagram;
- The tissue is frozen on a cryostat, very thin slices are removed from the entire edge and undersurface and these slices are then placed on slides and stained for examination under the microscope;
- The physician examines the entire undersurface and complete edge of the tissue specimen, and all microscopic “roots” of the cancer are precisely identified and pinpointed on the Mohs map; and
- Upon microscopic examination, if residual cancer is found, the physician utilizes the Mohs map to direct the removal of additional tissue.

The process is repeated as many times as necessary to locate any remaining cancerous areas within the tissue specimen. When the microscopic examination reveals that there is no remaining tumor, the surgical defect is repaired.

The HCPCS codes for Mohs micrographic surgery [i.e., 17304, 17305, 17306, 17307, and 17310] require a physician to act as both a surgeon and a pathologist. These codes include the physician’s microscopic examination and interpretation of tissue specimens. Both the microscopic examination and interpretation of tissue specimens are categorized as high complexity tests under CLIA in the specialty of histopathology.

At this time, all laboratory tests covered under CLIA are edited at the CLIA certificate level. The previously mentioned Mohs micrographic surgery HCPCS codes would require either a CLIA certificate of registration (certificate type code 9), a CLIA certificate of compliance (certificate type code 1), or a CLIA certificate of accreditation (certificate type code 3). A facility without a valid current CLIA certificate, with a current CLIA certificate of waiver (certificate type code 2), or with a current CLIA certificate for provider-performed microscopy procedures (certificate type code 4) will not be permitted to bill for these tests.

Medicare carriers will deny payment if a CLIA # is not submitted on claims by facilities for the HCPCS codes of 17304, 17305, 17306, 17307, and 17310.

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Additional Information

The official instruction issued to your carrier regarding this change can be found online, referenced via CR 3458, at <http://www.cms.gov/Regulations-and-Guidance/Guidance/Transmittals/downloads/R434CP.pdf> on the CMS website.

If you have questions regarding this issue, you may also contact your carrier at their toll free number, which may be found at <http://www.cms.gov/Research-Statistics-Data-and-Systems/Monitoring-Programs/provider-compliance-interactive-map/index.html> on the CMS website.

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