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## Provider Compliance Tips for Computed Tomography (CT) Scans

**Provider Types Affected:** Hospitals, physicians, and other providers billing for Computed Tomography (CT) scans and services.

### Background

Per Medicare’s “National Coverage Determination (NCD) Manual,” [NCD 220.1](#), CT scans must be medically appropriate considering the patient’s symptoms and preliminary diagnosis. Local Coverage Determinations (LCDs) for CT scans further define the circumstances demonstrating medical necessity. Documentation must be available to Medicare upon request. Advanced imaging claims had an improper payment rate of 12.4% percent during the 2015 reporting period for the Comprehensive Error Rate Testing (CERT) program.

### Insufficient Documentation Causes Most Denials

Insufficient documentation caused more than 91.7 percent of the CERT identified improper payments. Insufficient documentation means that something was missing from the medical records. **Missing orders caused over half of the payment denials.**

### To Prevent Denials

- Check the order from the ordering practitioner to make sure it is signed. Retain a copy
- Document in your medical record that you performed a CT scan
- Retain a copy of the CT scan report from the radiologist or interpreting physician

- If you receive a documentation request from a Medicare review contractor, submit:
  1. **The order** from the ordering practitioner
    - If you forgot to keep a copy of the order, contact the ordering practitioner and request that they send you a copy of the order
    - If the ordering practitioner can't find a copy of the order in the patient's medical record, ask them to send you the progress notes, plan of care or any other medical record entry from PRIOR to the day of the CT scan that documents the intent to order the CT scan
    - If the signature on the order does not comply with Medicare's legibility rules, obtain a signature attestation from the ordering practitioner
  2. **The ordering practitioner's progress notes** or other medical record entries (for example, medical history, physical examination) documenting why the CT scan is needed
  3. **The medical record** entries made during the CT scan
  4. **The report** of the CT scan signed by the radiologist or interpreting physician

Use modifier "CT" where appropriate. MLN Matters® Article [MM9486](#) advises that effective January 1, 2016, Medicare requires that hospitals and suppliers use this modifier on claims for CT scans described by applicable HCPCS codes furnished on equipment that does not meet the National Electrical Manufacturers Association (NEMA) Standard XR-29-2013. Applicable HCPCS codes include:

- 70450 through 70498
- 71250 through 71275
- 72125 through 72133
- 72191 through 72194
- 73200 through 73206
- 73700 through 73706
- 74150 through 74178
- 74261 through 74263
- 75571 through 75574 (and any succeeding codes)



## Resources

The following resources are available to assist in complying with Medicare's policy for CT scans:

For More Information About...	Resource
The "Medicare National Coverage Determinations Manual," NCD 220.1	<a href="http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/ncd103c1_Part4.pdf">http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/ncd103c1_Part4.pdf</a>
LCDs	<a href="http://www.cms.gov/Medicare/Coverage/DeterminationProcess/LCDs.html">http://www.cms.gov/Medicare/Coverage/DeterminationProcess/LCDs.html</a>
"Medicare Coverage of Imaging Services" Fact Sheet	<a href="http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/downloads/Radiology_FactSheet_ICN907164.pdf">http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/downloads/Radiology_FactSheet_ICN907164.pdf</a>
A Signature Attestation Statement Example	<a href="https://www.certprovider.com/SignatureAttestationStatement.aspx">https://www.certprovider.com/SignatureAttestationStatement.aspx</a>
Medicare's signature guidelines	<a href="http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/downloads/Signature_Requirements_Fact_Sheet_ICN905364.pdf">http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/downloads/Signature_Requirements_Fact_Sheet_ICN905364.pdf</a>
MLN Matters Article MM9486 with information on the new "CT" modifier	<a href="https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/downloads/MM9486.pdf">https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/downloads/MM9486.pdf</a>

## Hyperlink Table

Embedded Hyperlink	Complete URL
NCD 220.1	<a href="http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/ncd103c1_Part4.pdf">http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/ncd103c1_Part4.pdf</a>
MM9486	<a href="https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/downloads/MM9486.pdf">https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/downloads/MM9486.pdf</a>



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