PROVIDER COMPLIANCE TIPS FOR BARIATRIC SURGERY

PROVIDER TYPES AFFECTED
Surgeons who perform bariatric surgery

BACKGROUND
Medicare Fee-For-Service and inpatient hospital services cover bariatric surgical procedures. Review provisions in National Coverage Determination (NCD) for BARIATRIC SURGERY for Treatment of Co-Morbid Conditions Related to Morbid Obesity (100.1).

REASONS FOR DENIAL
- Insufficient documentation
- Documentation fails to support procedures as reasonable or necessary
- Providers do not comply with signature requirements

HOW TO PREVENT DENIALS
Beneficiaries must meet the following Medicare coverage criteria:
- Body-mass index (BMI) of more than or equal to 35 kg/m²
- At least one comorbidity related to obesity
- Previously unsuccessful with medical treatment for obesity

Consider the following when billing Medicare for bariatric surgery services:
- Bariatric surgery procedures are performed to treat comorbid conditions associated with morbid obesity
  - Types of surgical procedures:
    - Malabsorptive—Divert food from the stomach to a lower part of the digestive tract where the normal mixing of digestive fluids and absorption of nutrients cannot occur
    - Restrictive—Restrict the size of the stomach and decrease intake
    - Both types of procedures can be combined
● Procedures include:
  ● Roux-en-Y Gastric Bypass (RYGBP)
    ◦ Gastric restriction and malabsorption; reduction of the stomach to a small gastric pouch (30 cc); open or laparoscopic
  ● Biliopancreatic Diversion with Duodenal Switch (BPD/DS) or Gastric Reduction Duodenal Switch (BPD/GRDS)
    ◦ Gastric restriction and malabsorption; the stomach is partially resected, but the remaining capacity is generous compared to that achieved with RYGBP; open or laparoscopic
  ● Adjustable Gastric Banding (AGB)
    ◦ Gastric restriction only; a band creating a gastric pouch with a capacity of approximately 15 to 30 ccs encircles the uppermost portion of the stomach; laparoscopic only
  ● Sleeve Gastrectomy
    ◦ Sleeve resection of the stomach; open or laparoscopic
  ● Vertical Gastric Banding (VGB)
    ◦ Gastric restriction only; the upper part of the stomach is stapled (rarely performed)

Non-covered:
  ● Treatments for obesity alone
  ● Supplemented fasting as a general treatment for obesity
  ● Open adjustable gastric banding
  ● Open and laparoscopic sleeve gastrectomy (Medicare Administrative Contractors may determine coverage of stand-alone laparoscopic sleeve gastrectomy)
  ● Open and laparoscopic vertical banded gastroplasty
  ● Intestinal bypass surgery
  ● Gastric balloon
## RESOURCES

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<thead>
<tr>
<th>FOR MORE INFORMATION ABOUT…</th>
<th>RESOURCE</th>
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<tr>
<td>The 2017 Medicare Fee-For-Service Supplemental Improper Payment Date</td>
<td><a href="https://www.cms.gov/Research-Statistics-Data-and-Systems/Monitoring-Programs/Medicare-FFS-Compliance-Programs/CERT/CERT-Reports-Items/2017-Medicare-FFS-Payment-Data.html?DLPage=1&amp;DLEntries=10&amp;DLSort=0&amp;DLSort-Dir=descending">https://www.cms.gov/Research-Statistics-Data-and-Systems/Monitoring-Programs/Medicare-FFS-Compliance-Programs/CERT/CERT-Reports-Items/2017-Medicare-FFS-Payment-Data.html?DLPage=1&amp;DLEntries=10&amp;DLSort=0&amp;DLSort-Dir=descending</a></td>
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<tr>
<td>National Coverage Determination (NCD) for BARIATRIC SURGERY for Treatment of Co-Morbid Conditions Related to Morbid Obesity (100.1)</td>
<td><a href="https://www.cms.gov/medicare-coverage-database/details/ncd-details.aspx?NCDId=57&amp;ncdver=5&amp;CoverageSelection=Both&amp;ArticleType=All&amp;Policy-Type=Final&amp;s=All&amp;KeyWord=Bariatric+Surgery&amp;KeyWordLookUp=Title&amp;KeyWordSearchType=And&amp;bc=gAAAAACAAAAAAA%3d%3d&amp;">https://www.cms.gov/medicare-coverage-database/details/ncd-details.aspx?NCDId=57&amp;ncdver=5&amp;CoverageSelection=Both&amp;ArticleType=All&amp;Policy-Type=Final&amp;s=All&amp;KeyWord=Bariatric+Surgery&amp;KeyWordLookUp=Title&amp;KeyWordSearchType=And&amp;bc=gAAAAACAAAAAAA%3d%3d&amp;</a></td>
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