Medicare Billing: 837P & Form CMS-1500

What’s Changed?

• Note: No substantive content updates.

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## Contents

- Submitting Accurate Claims ................................................................. 3
- 837P ........................................................................................................ 4
- ANSI ASC X12N 837P .......................................................................... 4

**Form CMS-1500** ............................................................................. 4

- Coding ................................................................................................... 4
- Submitting Medicare Claims ............................................................... 5
- Where to Submit Claims ..................................................................... 6
- Electronic Filing Exceptions & Waivers ................................................ 7
- Resources ............................................................................................ 8
This fact sheet offers education for health care administrators, medical coders, billing and claims processing personnel, and other medical administrative staff responsible for submitting Medicare professional and supplier claims using the 837P or Health Insurance Claim Form (CMS-1500). We'll refer to it as the **CMS-1500** throughout this document.

Note: The term patient refers to a Medicare beneficiary.

### ASETT Tool

An **Administrative Simplification Enforcement and Testing Tool** (ASETT) is available through CMS's **Identity Management (IDM) System**. The Test Transaction Tool checks all transactions for compliance, syntax, and business rules. Validate transactions across various formats:

- ASC X12 5010
- NCPDP D.0
- ICD-10 diagnostic and procedure codes
- Unique Identifiers

### Submitting Accurate Claims

Health care providers and suppliers must submit accurate claims For more information on this, review the [Medicare Program Integrity Manual, Chapter 4](#). For the latest billing information, review the [Medicare Claims Processing Manual](#).

Medicare coverage and payments that require an item or service:

- Meet a benefit category
- Isn’t specifically excluded from coverage
- Is reasonable and necessary

Submit all documentation needed to support the patient’s medical necessity when the Medicare Administrative Contractor (MAC) asks for it.
837P

The 837P (Professional) is the standard format health care providers and suppliers use to send health care claims electronically.

ANSI ASC X12N 837P

The ANSI ASC X12N 837P (Professional) Version 5010A1 is the current electronic claim version. Find more information on the [ASC X12](https://www.asc-x12.org) website.

The [National Uniform Claim Committee (NUCC)](https://www.nucc.org) developed a crosswalk between the ASC X12N 837P and hard copy claim form. MACs may also include a crosswalk on their websites.

Form CMS-1500

We allow physicians, practitioners, and suppliers to submit a [1500 Health Insurance Claim Form](https://www.cms.gov) under certain situations.

Sometimes providers use the 837P and CMS-1500 to bill certain government and private insurers. We make data elements in the uniform electronic billing specifications consistent with the hard copy data set to the extent that 1 processing system can handle those claims.

Coding

Correct coding is important when submitting valid claims. Use current diagnosis and procedure codes and complete claims to the highest level of specificity. Use the greatest number of digits available to make sure claims are as accurate as possible. The [Medicare Claims Processing Manual, Chapter 23](https://www.cms.gov) has information on diagnosis coding, procedure coding, and instructions for codes with modifiers.
Diagnosis Coding
Use ICD-10-CM to code claims’ diagnostic information. The CDC website has access to ICD-10-CM codes electronically, or you can buy hard copy code books from code book publishers.

Procedure Coding
Use HCPCS Level I and II codes to code all claim procedures. Level I CPT-4 codes describe medical procedures and professional services. CPT’s a numeric coding system the American Medical Association (AMA) maintains. Get the CPT code book at the AMA Bookstore.

The Medicare Learning Network® (MLN) has an Evaluation and Management Services Guide that offers helpful information about the HCPCS Level I codes subset.

HCPCS Level II is a standardized coding system used primarily to name products, supplies, and services not included in CPT codes when used outside a physician’s office or injections administered within a physician’s office or clinic. To view these codes, review the HCPCS code book or visit the Alpha-Numeric HCPCS webpage.

Submitting Medicare Claims
The Medicare Claims Processing Manual has submitting claims instructions:

- **Chapter 1** has health care providers and suppliers general billing requirements
- **Chapter 12** has claims processing instructions for physicians and non-physician practitioners
- **Chapter 24** explains electronic filing requirements and the Electronic Data Interchange (EDI) form required before submitting electronic claims
- **Chapter 26** explains what each 837P or CMS-1500 claim must include


Modifiers
Use proper modifiers with procedure codes to submit correct claims. The AMA's CPT code book includes HCPCS Level I codes and modifiers. The HCPCS code book includes HCPCS Level II codes and related modifiers. Resources about modifiers:

- **Proper Use of Modifiers 59 & –X(EPSU)** fact sheet explains correct use of modifiers 59 and–X(EPSU)
- **Physician Bonuses** webpage explains whether you must use a modifier to get a Health Professional Shortage Area (HPSA) bonus payment
- **Medicare Claims Processing Manual** offers modifier information
Where to Submit Claims

For patients enrolled in Medicare Fee-for-Service (FFS), submit service claims to the MAC for the state where the services were provided. Each DMEPOS supplier submits claims to the DME MAC for the state where the patient resides. Find your MAC’s website.

You can’t charge patients for completing or filing a claim. We subject providers to penalties for violations.

For patients enrolled in a Medicare Advantage (MA) Plan, submit claims to the patient’s MA Plan. For patients with primary coverage other than Medicare, also known as Medicare Secondary Payer (MSP), you must bill the correct insurer first. Find information in the Medicare Secondary Payer booklet, the Medicare Secondary Payer manual and the Medicare Secondary Payer webpage.

Timely Filing

Providers must file Medicare claims with their MAC no later than 12 months, or 1 CY, after the service date.

We’ll deny claims if they arrive after the deadline. When we deny a claim for timely filing, this isn’t the same thing as an initial determination. If you don’t file the claim timely, you can’t appeal it for payment.

For claims submitted by health care providers and suppliers that span service dates, we use the line item From date to find the claims filing timeliness service date. This includes durable medical equipment, supplies, and rental items. If a line item From date isn’t timely but there’s a timely To date, we split the line item and deny the untimely services.

Late Claims Exceptions

Find information on timely filing exceptions in the Medicare Claims Processing Manual, Chapter 1, Section 70.5.

Electronic Transactions Implementation & Companion Guides

Health care providers or suppliers billing electronic claims must comply with the ASC X12N implementation guide. It has instructions on content and format requirements for each standard’s requirements. The 837P Health Care Claim: Professional Implementation Guide is available from X12 by purchasing an X12 License. You can read more about X12 licensing. ASC X12N implementation guides are specific technical instructions for implementing each adopted HIPAA standard and have instructions on content and format requirements for each standard’s requirements. ASC X12N writes these documents for all health benefit payers.
Each MAC publishes a CMS-approved Medicare FFS HIPAA 837P Companion Guide (CG).

- CG defines specific Medicare FFS data content requirements used with, but not in place of, the HIPAA 837P.
- Find your MAC’s website or review the Medicare Fee-for-Service Companion Guides webpage to locate your CG.

Implementation and companion guides are technical documents, and you may need help from billing agencies, clearinghouses, or software vendors to interpret and implement the information.

**Electronic Filing Exceptions & Waivers**

Providers must submit initial Medicare claims electronically unless they qualify for a waiver or exception under the electronic claims submission Administrative Simplification Compliance Act (ASCA) requirement.

**ASCA Exceptions**

Before submitting a hard copy claim on the CMS-1500, decide if it meets 1 or more ASCA exceptions. Medicare exempts health care professional and supplier billing when you:

- Have less than 10 Full-Time Equivalent (FTE) employees and bill a MAC
- Roster bill, which allows mass immunizers to complete 1 CMS-1500 with the flu or pneumonia shot and attach a roster listing patients who got that shot, rather than submitting separate CMS-1500 claim forms
- Submit paper claims under a Medicare demonstration project
- Submit MSP claims when there’s more than 1 primary payer and more than 1 allowed amount, including more than 1 contractual obligation amount, as applicable

If you meet an exception, you don’t need to submit a waiver request. Health care providers or suppliers who submit paper claims exception justification are either:

- Notified of approval by mail
- Notified exception wasn’t approved, and all their paper claims denied, effective the 91st day after the first letter date asking for documentation

If health care providers or suppliers don’t respond to a request for exception information, CMS will deny their paper claims, effective the 91st day after the first letter date asking for documentation.

Health care providers or suppliers can’t appeal these decisions.

**Waiver Requests**

These Unusual Circumstance Waivers are subject to Provider Self-Assessment and always meet waiver criteria:

- Dental claims
- Electricity or phone communication disruption
- Large group practice or supplier that submits less than 10 claims per month and not more than 120 claims per year
Unusual Circumstance Waivers require Medicare pre-approval to submit paper claims in these situations:

- Provider alleges claim transaction implementation guides adopted under HIPAA don’t support electronic submission of all data needed for claim adjudication
- Provider isn’t small, but all those employed have documented disabilities that prevent personal computer use for electronic claim submission
- Any other unusual situation documented by a provider to prove enforcement of electronic claim submission requirements is against equity and good conscience

Find more information about ASCA waivers and exceptions on the Electronic Billing & EDI Transactions webpage.

Find more information on ASCA health care providers and suppliers electronic billing requirements and enforcement reviews in the Medicare Claims Processing Manual, Chapter 24, Sections 90–90.6.

Download a sample Form CMS-1500. We don’t accept CMS-1500 copies for claim submission because they may not accurately replicate form colors. The system needs the colors for automated form reading. We only accept claim forms printed in Flint OCR Red, J6983, or exact match ink. Visit the U.S. Government Bookstore to order the form, or contact local printing companies or office supply stores to get them.

Resources

- Medicare Part B EDI Helpline document
- HIPAA and Administrative Simplification webpage
- Medicare Billing: 837P & Form CMS-1500 web-based training course
- OIG Office of Audit Services website

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