



HEALTH AFFAIRS

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

WASHINGTON, DC 20301-1200

APR 19 2007

MEMORANDUM FOR SURGEON GENERAL OF THE ARMY  
SURGEON GENERAL OF THE NAVY  
SURGEON GENERAL OF THE AIR FORCE

SUBJECT: Policy on Military Treatment Facilities Not Billing for Telephone Calls

TRICARE Management Activity (TMA) policy memorandum of March 24, 1999, (TMA Policy 99-005) provided policy for overseas billing for clinical telephone calls. It called for an overseas billing moratorium because the then available billing methodology needed to be updated. Stateside military treatment facilities (MTFs) were allowed to continue billing for telephone calls.

The Uniform Business Office (UBO) Outpatient Rates File that was deployed to MTFs in June 2006, contained rates for telephone call encounters using Current Procedural Terminology (CPT) codes 99371 and 99372. No rate was provided for CPT code 99373 which is another code that is used to document more complex telephone call encounters.

In order to code a telephone call encounter, documentation requirements for the CPTs must be satisfied in accordance with The Military Health System Coding Guidance: Professional Services and Specialty Coding Guidelines, Version 2.0, dated March 1, 2007, Page 3-7, Section 3-6 ([http://tricare.osd.mil/ocfo/bea/ubu/coding\\_guidelines.cfm](http://tricare.osd.mil/ocfo/bea/ubu/coding_guidelines.cfm)):

“Telephone calls are an interaction between a privileged provider and patient. Documentation must contain evidence of medical decision making by a licensed provider directly responsible for the management of the patient’s care. Telephone calls will not be coded for provider-provider coordination, leaving messages on answering machines, or speaking with a Commander about an AD member. Administrative services (e.g. scheduling, billing, and communication of non-clinical information) should not be coded. These encounters are reviewed for appropriate clinical documentation by Service audits. Privileged providers, including residents beyond post-graduate year one (PGY1), may choose from the three E&M codes for telephone calls. (99371, 99372, and 99373).”

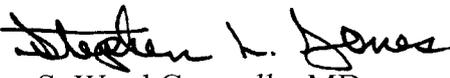
**HA POLICY: 07-005**

Because of concerns regarding the sufficiency of documentation needed to support the use of CPT codes 99371 and 99372 for billing, I direct that MTFs ( both CONUS and OCONUS) halt all billing for telephone calls effective the date of this memo. Further, no follow-up collection action should be taken on bills already sent out for telephone call encounters.

Request you provide your certification, no later then November 30, 2007, that your Service has the necessary processes and procedures in effect to ensure sufficient documentation needed to support billing for telephone calls.

Once all three Services have certified readiness to resume billing, a new policy memo will be issued directing the resumption of billing for telephone calls by MTFs (both CONUS and OCONUS).

My point of contact is Lt Col Jeanne Yoder who may be reached at (703) 681-3492 and email: *Jeanne.Yoder@tma.osd.mil*.

  
for S. Ward Casscells, MD