

## Billing Education Article By Dr. Rhonda Church

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### TIME-BASED CODES – TAKE TIME TO SATISFY PREAMBLE REQUIREMENTS

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As physicians, we maintain patient charts for a number of reasons. It helps us and others involved in the care of the patient to recall what the patient said, what interventions were undertaken, and the agreed upon management plan.

Additionally, our patient charts are an important source of information about services for which we have billed. The Preamble to the MSI Physician's Manual states that claims made to MSI must be supported by the patient record for those claims. For a number of health service codes, there are technical requirements that go beyond what we, as physicians, normally document for purposes of patient care. At the time of audit, MSI requires that the technical requirements for claiming the health service code under review have been met.

When physicians claim time-based codes, it's mandatory that start and stop times of the encounter with the patient be documented directly on the clinical record. This requirement has been in existence for many years – I recall it from when I began practicing in Nova Scotia more than 20 years ago – and MSI bulletins regularly remind physicians of it. Nonetheless, absence of start and finish times remains one of the most common deficiencies seen at the time of audit. If these times are absent, a recovery to MSI is calculated.

Here are a few tips to help you with submission of time-based claims:

- **Commonly used codes**  
Know which time-based codes you commonly use.
- **Start and finish times**  
Record the start and finish times you spent face-to-face with the patient directly on the patient chart (i.e. not on the appointment or day sheet). Be sure the times are legible and are somewhere they will be easily seen if the service is audited.
- **'By the clock'**  
Use the start and finish times "by the clock" rather than total time spent, as the latter doesn't meet Preamble requirements. For example, record "10:00 to 10:35" rather than "35 minutes."
- **Face-to-face time**  
Record only the time spent face-to-face with the patient as this is the basis for payment. Don't, for example, include time spent completing the chart note after the visit.
- **Preamble requirements**  
Be sure you and your billing clerk are familiar with the Preamble requirements for the time-based codes you use as these vary. For example, if you are billing a counselling or psychotherapy code or a palliative care support visit, you must spend at least 80 per cent of time claimed directly with the patient. If you are claiming a complex care visit (health service code 03.03B) you must spend at least 15 minutes with the patient.

- **Prolonged consultation**  
Some specialties may claim a prolonged consultation if more than one hour is spent directly with the patient. Record the start and finish times for the total encounter with the patient, rather than just the time exceeding one hour.
- **Uninsured services**  
Remember that services provided by nurses and other groups of health-care providers are uninsured in Nova Scotia. If you work with a nurse, record the start and finish times of your own encounter with the patient.
- **Medical trainee services**  
You may claim for the services provided by medical trainees, provided the requirements of Preamble section 8.1.2 are met. Central to these requirements is the principle that you can't have more than one clock running at a time. You may claim for your services or the medical trainee's, if they are provided at the same time. For psychotherapy only, if you are supervising a trainee who is providing psychotherapy and you are seeing other patients at the same time, you may claim for the time spent reviewing the chart and discussing the patient with the trainee. Record the start and finish times of the discussion with the student or resident in this circumstance. The total time claimed may not exceed the time the trainee spent with the patient.

As always, MSI welcomes inquiries regarding submission of claims. Contact us at [MSI\\_Assessment@Medavie.BlueCross.ca](mailto:MSI_Assessment@Medavie.BlueCross.ca)

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