



Medical Decision Making: Looking at Visit Levels related to 2021 Office Visit E/M Coding Changes

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Agenda

- Review the 3 components of MDM:
 - Problems addressed
 - Data reviewed/analyzed
 - Risk
- Explore MDM from the lens of visit levels
- Discuss some common scenarios

Disclaimer

- I am not a certified coder
- I am have no legal credentials
- I do not work for AMA or the AAP
- The information that you are about to see is my personal interpretation of educational materials that are available in the public domain
- There are nuances about coding, documentation and audits that are yet unknown since we are entering uncharted territory
- I do not have a crystal ball
- ***It is the legal responsibility of each provider who sees patients to educate themselves to the fullest extent possible, and choose the most appropriate code that represents the work which they performed***

What is “Medical Decision Making (MDM)”

- “*Medical Decision Making Medical decision making includes establishing diagnoses, assessing the status of a condition, and/or selecting a management option.*” [\(AMA definition\)](#)
- Medical decision making in the office and other outpatient services code set is defined by three elements (problems, data, risk).
- To qualify for a particular level of medical decision making, ***two of the three elements*** for that level of medical decision making ***must be met or exceeded.***
- MDM is the ***cognitive process*** required to manage the patient’s problems at the time of the encounter that you are billing for.

2/3 Elements Must Be Met or Exceeded

CODE	MDM LEVEL	NUMBER & COMPLEXITY OF PROBLEMS ADDRESSED	AMOUNT &/OR COMPLEXITY OF DATA REVIEWED OR ANALYZED	RISK OF COMPLICATIONS &/OR MORBIDITY/MORTALITY OF PATIENT MANAGEMENT
99202/99212	Straightforward	Minimal	Minimal or None	Minimal risk of morbidity from additional diagnostic testing or treatment
99203/99213	Low	Low	Limited	Low risk of morbidity from additional diagnostic testing or treatment
99204/99214	Moderate	Moderate	Moderate	Moderate risk of morbidity from additional diagnostic testing or treatment
99205/99215	High	High	Extensive	High risk of morbidity from additional diagnostic testing or treatment

AMA MDM Chart: Level 1-3

Code	Level of MDM (Based on 2 out of 3 Elements of MDM)	Elements of Medical Decision Making		
		Number and Complexity of Problems Addressed	Amount and/or Complexity of Data to be Reviewed and Analyzed <i>*Each unique test, order, or document contributes to the combination of 2 or combination of 3 in Category 1 below.</i>	Risk of Complications and/or Morbidity or Mortality of Patient Management
99211	N/A	N/A	N/A	N/A
99202 99212	Straightforward	Minimal • 1 self-limited or minor problem	Minimal or none	Minimal risk of morbidity from additional diagnostic testing or treatment
99203 99213	Low	Low • 2 or more self-limited or minor problems; or • 1 stable chronic illness; or • 1 acute, uncomplicated illness or injury	Limited (Must meet the requirements of at least 1 of the 2 categories) Category 1: Tests and documents • Any combination of 2 from the following: • Review of prior external note(s) from each unique source*; • review of the result(s) of each unique test*; • ordering of each unique test* or Category 2: Assessment requiring an independent historian(s) (For the categories of independent interpretation of tests and discussion of management or test interpretation, see moderate or high)	Low risk of morbidity from additional diagnostic testing or treatment

AMA MDM Chart: Levels 4-5

99204 99214	Moderate	Moderate <ul style="list-style-type: none"> 1 or more chronic illnesses with exacerbation, progression, or side effects of treatment; or <ul style="list-style-type: none"> 2 or more stable chronic illnesses; or <ul style="list-style-type: none"> 1 undiagnosed new problem with uncertain prognosis; or <ul style="list-style-type: none"> 1 acute illness with systemic symptoms; or <ul style="list-style-type: none"> 1 acute complicated injury 	Moderate <i>(Must meet the requirements of at least 1 out of 3 categories)</i> <p>Category 1: Tests, documents, or independent historian(s)</p> <ul style="list-style-type: none"> Any combination of 3 from the following: <ul style="list-style-type: none"> Review of prior external note(s) from each unique source*; Review of the result(s) of each unique test*; Ordering of each unique test*; Assessment requiring an independent historian(s) or <p>Category 2: Independent interpretation of tests</p> <ul style="list-style-type: none"> Independent interpretation of a test performed by another physician/other qualified health care professional (not separately reported); or <p>Category 3: Discussion of management or test interpretation</p> <ul style="list-style-type: none"> Discussion of management or test interpretation with external physician/other qualified health care professional/appropriate source (not separately reported) 	Moderate risk of morbidity from additional diagnostic testing or treatment <i>Examples only:</i> <ul style="list-style-type: none"> Prescription drug management Decision regarding minor surgery with identified patient or procedure risk factors Decision regarding elective major surgery without identified patient or procedure risk factors Diagnosis or treatment significantly limited by social determinants of health
99205 99215	High	High <ul style="list-style-type: none"> 1 or more chronic illnesses with severe exacerbation, progression, or side effects of treatment; or <ul style="list-style-type: none"> 1 acute or chronic illness or injury that poses a threat to life or bodily function 	Extensive <i>(Must meet the requirements of at least 2 out of 3 categories)</i> <p>Category 1: Tests, documents, or independent historian(s)</p> <ul style="list-style-type: none"> Any combination of 3 from the following: <ul style="list-style-type: none"> Review of prior external note(s) from each unique source*; Review of the result(s) of each unique test*; Ordering of each unique test*; Assessment requiring an independent historian(s) or <p>Category 2: Independent interpretation of tests</p> <ul style="list-style-type: none"> Independent interpretation of a test performed by another physician/other qualified health care professional (not separately reported); or <p>Category 3: Discussion of management or test interpretation</p> <ul style="list-style-type: none"> Discussion of management or test interpretation with external physician/other qualified health care professional/appropriate source (not separately reported) 	High risk of morbidity from additional diagnostic testing or treatment <i>Examples only:</i> <ul style="list-style-type: none"> Drug therapy requiring intensive monitoring for toxicity Decision regarding elective major surgery with identified patient or procedure risk factors Decision regarding emergency major surgery Decision regarding hospitalization Decision not to resuscitate or to de-escalate care because of poor prognosis

Level 1 Visits: 99211

- There IS no level 1 visit for a new patient
- The concept of MDM does not apply to code 99211
- 99211 definition: office or other outpatient visit for the evaluation and management of an established patient, that may not require the presence of a physician or other qualified healthcare professional.
- Usually, the presenting problem(s) are minimal
- Example: nurse visit for blood pressure follow-up
- You **cannot** use 99211 E/M services (or any E/M services) for vaccine only visits (even if parents choose to split vaccines). The entire nursing work for vaccine visits is part of the vaccine administration code.

Level 2 Visits: 99202/99212

MDM LEVEL	NUMBER & COMPLEXITY OF PROBLEMS ADDRESSED	AMOUNT &/OR COMPLEXITY OF DATA REVIEWED OR ANALYZED	RISK OF COMPLICATIONS &/OR MORBIDITY/MORTALITY OF PATIENT MANAGEMENT
Straightforward	Minimal	Minimal or None	Minimal risk of morbidity from additional diagnostic testing or treatment

- Problems: 1 self limited or minor problem
- Data: No or minimal data reviewed
- Risk: minimal risk

Examples:

Insect bite, observe only

Contact diaper rash, open to air, avoid wipes

Level 3 Visits: 99203/99213

MDM LEVEL	NUMBER & COMPLEXITY OF PROBLEMS ADDRESSED	AMOUNT &/OR COMPLEXITY OF DATA REVIEWED OR ANALYZED	RISK OF COMPLICATIONS &/OR MORBIDITY/MORTALITY OF PATIENT MANAGEMENT
Low	Low	Limited	Low risk of morbidity from additional diagnostic testing or treatment

- Problems: 2+ self-limited or minor problems *or* 1 stable chronic illness *or* 1 acute uncomplicated illness or injury
- Data: Category 1: Any combination of **2** from the following:
 - Review of prior external note(s) from each unique source
 - Review of the result(s) of each unique test
 - Ordering of each unique test*or* Category 2: Assessment requiring an independent historian(s)

Level 3 Visits: 99203/99213

MDM LEVEL	NUMBER & COMPLEXITY OF PROBLEMS ADDRESSED	AMOUNT &/OR COMPLEXITY OF DATA REVIEWED OR ANALYZED	RISK OF COMPLICATIONS &/OR MORBIDITY/MORTALITY OF PATIENT MANAGEMENT
Low	Low	Limited	Low risk of morbidity from additional diagnostic testing or treatment

- Risk: low risk from additional testing or treatment

Examples:

Candidal diaper rash & Neonatal acne: OTC antifungal, observation only

Sprained ankle: RICE, NSAIDs

Anxiety f/u: no meds, doing well, continue counseling

Level 4 Visits: 99204/99214

MDM LEVEL	NUMBER & COMPLEXITY OF PROBLEMS ADDRESSED	AMOUNT &/OR COMPLEXITY OF DATA REVIEWED OR ANALYZED	RISK OF COMPLICATIONS &/OR MORBIDITY/MORTALITY OF PATIENT MANAGEMENT
Moderate	Moderate	Moderate	Moderate risk of morbidity from additional diagnostic testing or treatment

- Problems: 1+ chronic illnesses with exacerbation, progression, or side effects of treatment **or** 2+ stable chronic illnesses **or** 1 undiagnosed new problem with uncertain prognosis **or** 1 acute illness with systemic symptoms **or** 1 acute complicated injury

Level 4 Visits: 99204/99214

MDM LEVEL	NUMBER & COMPLEXITY OF PROBLEMS ADDRESSED	AMOUNT &/OR COMPLEXITY OF DATA REVIEWED OR ANALYZED	RISK OF COMPLICATIONS &/OR MORBIDITY/MORTALITY OF PATIENT MANAGEMENT
Moderate	Moderate	Moderate	Moderate risk of morbidity from additional diagnostic testing or treatment

- **Data: 1 out of 3 categories**

- Category 1: Any combination of **3** from the following:
 - Review of prior external note(s) from each unique source
 - Review of the result(s) of each unique test
 - Ordering of each unique test
 - Assessment requiring an independent historian(s) **OR**
- Category 2: Independent interpretation of tests **OR**
- Category 3: Discussion of management or test interpretation

Level 4 Visits: 99204/99214

MDM LEVEL	NUMBER & COMPLEXITY OF PROBLEMS ADDRESSED	AMOUNT &/OR COMPLEXITY OF DATA REVIEWED OR ANALYZED	RISK OF COMPLICATIONS &/OR MORBIDITY/MORTALITY OF PATIENT MANAGEMENT
Moderate	Moderate	Moderate	Moderate risk of morbidity from additional diagnostic testing or treatment

- Risk Moderate risk w/examples including:
 - **Prescription drug management**
 - Decision regarding minor surgery with identified patient or procedure risk factors
 - Decision regarding elective major surgery without identified patient or procedure risk factors
 - **Diagnosis or treatment significantly limited by social determinants of health**

Level 4 Visits: 99204/99214

MDM LEVEL	NUMBER & COMPLEXITY OF PROBLEMS ADDRESSED	AMOUNT &/OR COMPLEXITY OF DATA REVIEWED OR ANALYZED	RISK OF COMPLICATIONS &/OR MORBIDITY/MORTALITY OF PATIENT MANAGEMENT
Moderate	Moderate	Moderate	Moderate risk of morbidity from additional diagnostic testing or treatment

Examples:

Asthma w/mild exacerbation, review document from last visit to allergist, review recent ER visit for asthma, independent historian OR no data review but write a prescription for increased inhaled steroid controller and review updated asthma action plan

New onset petechiae, independent historian, order a CBC, PT/PTT (or order nothing but discuss with hematologist)

Level 5 Visits: 99205/99215

MDM LEVEL	NUMBER & COMPLEXITY OF PROBLEMS ADDRESSED	AMOUNT &/OR COMPLEXITY OF DATA REVIEWED OR ANALYZED	RISK OF COMPLICATIONS &/OR MORBIDITY/MORTALITY OF PATIENT MANAGEMENT
High	High	Extensive	High risk of morbidity from additional diagnostic testing or treatment

- Problems: 1+ chronic illnesses with *severe* exacerbation, progression, or side effects of treatment **or** 1 acute or chronic illness or injury that *poses a threat to life or bodily function*

Level 5 Visits: 99205/99215

MDM LEVEL	NUMBER & COMPLEXITY OF PROBLEMS ADDRESSED	AMOUNT &/OR COMPLEXITY OF DATA REVIEWED OR ANALYZED	RISK OF COMPLICATIONS &/OR MORBIDITY/MORTALITY OF PATIENT MANAGEMENT
High	High	Extensive	High risk of morbidity from additional diagnostic testing or treatment

- Data: **2 out of 3 categories**
 - Category 1: Any combination of **3** from the following:
 - Review of prior external note(s) from each unique source
 - Review of the result(s) of each unique test
 - Ordering of each unique test
 - Assessment requiring an independent historian(s) **OR**
 - Category 2: Independent interpretation of tests **OR**
 - Category 3: Discussion of management or test interpretation

Level 5 Visits: 99205/99215

MDM LEVEL	NUMBER & COMPLEXITY OF PROBLEMS ADDRESSED	AMOUNT &/OR COMPLEXITY OF DATA REVIEWED OR ANALYZED	RISK OF COMPLICATIONS &/OR MORBIDITY/MORTALITY OF PATIENT MANAGEMENT
High	High	Extensive	High risk of morbidity from additional diagnostic testing or treatment

- Risk: High with examples including
 - **Drug therapy requiring intensive monitoring for toxicity**
 - Decision regarding elective major surgery with identified patient or procedure risk factors
 - Decision regarding emergency major surgery
 - **Decision regarding hospitalization**
 - Decision not to resuscitate or to de-escalate care because of poor prognosis

Level 5 Visits: 99205/99215

MDM LEVEL	NUMBER & COMPLEXITY OF PROBLEMS ADDRESSED	AMOUNT &/OR COMPLEXITY OF DATA REVIEWED OR ANALYZED	RISK OF COMPLICATIONS &/OR MORBIDITY/MORTALITY OF PATIENT MANAGEMENT
High	High	Extensive	High risk of morbidity from additional diagnostic testing or treatment

Examples:

- Pt with severe asthma exacerbation and hypoxia/increased work of breathing in office. Refer for hospital admission
- Pt with chronic depression with verbalized threats of self-harm. Refer for crisis psych eval, hospital placement
- Patient with autism, worsening physical aggression outbursts to caregivers, just started atypical antipsychotics which are monitoring for toxicity w/labs
- Pt with worsening seizures, had one this AM which was prolonged w/color change. Independent historian, review last neurology report, review most recent seizure med levels done by specialist, call neurologist to discuss

Where Can I Learn More?

- [AMA Guidance](#)
- [AAP Guidance](#) including
 - [Summary of Time Changes](#)
 - [New Prolonged Service Code](#)
 - [FAQs](#) (updated frequently)
 - [Coding Newsletter](#) (subscription required but well worth it!)
 - [Coding for Pediatrics 2021 Edition](#) (purchase but a must have!)
 - [Pediatric Evaluation and Management: Coding Quick Reference Card 2021](#) (\$21.95 for non members, \$16.95 for AAP Members)
- Section on Administration and Practice Management AAP FAQs: <http://bit.ly/faq2021cpt> (and while you are there, [join SOAPM!](#))



For your time
& attention

Be sure to take advantage of our other sections on MDM
and Time!

