

2022 CMS Evaluation and Management Regulation Modifications

March 08, 2022

On 2/23 and 2/24/2022, National Government Services presented webinars titled “**2022 CMS Evaluation and Management Regulation Modifications**”. Subsequent to those sessions, NGS sought and received clarification directly from CMS on several points. They are sharing the following to advise all participants of the most recent and accurate guidelines as provided by CMS:

- ⇒ As of 1/1/2022, split/shared services, performed collaboratively by physicians and NPPs within a group practice, may be performed in the inpatient and outpatient facility setting. Split/shared guidelines apply to:
 - Consultative services
 - Observation services
 - Admission and Discharge services
 - Critical Care services
- ⇒ Split/shared services are to be billed by the participating provider (physician or NPP) who performed and documented the substantive portion of the service.
- ⇒ In 2022, the substantive portion of a split/shared service may be identified based on service elements or time spent by each participant. (except for critical care which is only time-based)
- ⇒ In 2023, the substantive portion of a split/shared service will be identified only on time spent by each participant.
- ⇒ Time spent in both the outpatient and inpatient setting is not limited to time spent performing counseling or coordination of care. Time may be calculated based on all care contributing to the service