Medicare Updates for Peer Support: Principal Illness Navigation and Community Health Integration Codes

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"Incident to" Billing

- These services are provided using "Incident to" billing; 42 CFR 410.26
 - Designated care management services can be furnished under general supervision of the physician (or other practitioner) when these services or supplies are provided incident to the services of a physician (or other practitioner)
 - <u>Incident to</u>: services provided by auxiliary personnel under the supervision of a physician or qualified health practitioner
 - <u>Auxiliary personnel</u>: any individual who is acting under the general supervision of a physician (or other practitioner) and meets any applicable requirements to provide incident to services, including licensure, imposed by the State in which the services are being furnished.
 - General supervision: service is furnished under the physician's (or other practitioner's) overall direction and control, but the physician's (or other practitioner's) presence is not required during the performance of the service



Community Health Integration (CHI)

- Unmet needs that are interfering with medical care
- Incident to billing

Principal Illness Navigation (PIN)

- Navigation of a principal illness
- Incident to billing



Community Health Integration (CHI)

- Addresses unmet social determinants of health needs that significantly limit the practitioner's ability to diagnose or treat the patient
- Describes the use of auxiliary personnel including community health workers to (amongst other things):
 - Provide person-centered planning
 - Health system navigation
 - Coordinate services from health care practitioners, facilities, and from home-and community-based service providers and social service providers
 - Facilitate access to community resources
- Can be used in conjunction with other care management services
- G0019 is 60 min/month, G0022 is for each additional 30 min/month



Principal Illness Navigation (PIN)

- Addresses a serious, high-risk condition, illness, or disease expected to last at least 3 months, that places the patient at high risk of:
 - Hospitalization, nursing home placement
 - Acute exacerbation or decompensation, including functional decline or death
 - Note: includes behavioral health conditions
- Describes the use of auxiliary personnel including patient navigators to:
 - Provide person-centered planning
 - Health system navigation
 - Can also address unmet SDOH needs
- PIN: G0023 60 min/month, G0024 each additional 30 min/month



PIN-Peer Support (PIN-PS)

- PIN-Peer Support (PIN-PS) are subset of PIN based on peer support competencies, activities are slightly different
 - Changed "Conducting a person-centered assessment..." to "Conducting a person-centered interview..." based on public comments
 - Changed "Communication with practitioners, home-, and community-based services..." to "Assisting the patient in communicating with their practitioners, home-, and community-based services..."
- PIN-PS is limited to treatment of behavioral health conditions that otherwise satisfy the definition of high-risk conditions. Patients with behavioral health conditions can still receive PIN (G0023 and G0024), but patients cannot receive both PIN and PIN-PS for the same serious, high-risk condition
- PIN-PS: G0140 60min/month, G0146 each additional 30 min/month



PIN in Practice



Patient is diagnosed with highrisk condition Practitioner recognizes need for navigation support

Beneficiary meets with auxiliary personnel such as care navigator Auxiliary personnel operates under general supervision New code is billed by supervising physician/ practitioner



Auxiliary Personnel Requirements for CHI/PIN

- "Competencies of patient and family communication, interpersonal and relationship-building, patient and family capacity building, service coordination and systems navigation, patient advocacy, facilitation, individual and community assessment, professionalism and ethical conduct, and the development of an appropriate knowledge base
 - For CHI: including of local community-based resources."
 - For PIN: including specific certification or training on the serious, high-risk condition/illness/disease addressed in the initiating visit."
- Neither CHI nor PIN require a certain number of training hours



Resources

• CMS FAQs

