The "ABCs" of Observation Medicine 2015

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Disclosure of Commercial Relationships:

Nature of Relationship Name of Commercial Entity

•	Advisory Board	None
•	Consultant	None
•	Employee	None
•	Board Member	None
•	Shareholder	None
•	Speaker's Bureau	None
•	Patents	None

- Other Relationships
- CMS Technical Advisory Panel: AMI, HF, pneumonia
- Past CMS APC Advisory Panelist
- Chair Visits and Observation Subcommittee
- Co-chair, Mission Lifeline Atlanta, AHA
- Co-founder, Board of Directors Society of Cardiovascular Patient Care

Observation Medicine

- 1. What is it?
- 2. Why should you do it?
- 3. How do you do it?
- 4. Do you get paid?

What is it?

- The principles (or the patient)
- The service
- The setting
- The scope

1. What is it? – the principle

- What defines Emergency Medicine?
 - TIME (acuity)
- What defines Observation Medicine?
 - TIME (acuity)
- What defines Observation Patients?
 - TIME (acuity)
 - ED LOS for admitted patients = 5 hours
 - IP LOS for admitted patients = 5 days
 - Penalties for short IP LOS? < 24 hours</p>
 - What about patients needing **6-24 hours** of care???



What is it? – the service: OUTPATIENT OBSERVATION SERVICES

 Observation services are those services furnished on a hospital's premises, including use of a bed and periodic monitoring by nursing or other staff, which are reasonable and necessary to evaluate an outpatient's condition or determine the need for a possible admission as an inpatient...

Medicare: Hospital Manual, 3663

NEW "2-Midnight Rule" INPATIENT DEFINITION

- A 2-midnight <u>benchmark</u>: FOR <u>DOCTORS</u>
 - An inpatient is expected to stay in the hospital at least two midnights:
 - 24 hours and 1 minute, or 47 hours and 59 minutes
 - Outpatient time (ED or observation) counts
 - Inpatient stays < 2-MN not paid as an inpatient
 - except death, transfer, AMA, etc
- A 2-midnight <u>presumption</u>: FOR <u>REVIEWERS</u>
 - If a patient met benchmark criteria, the admission will not be scrutinized by reviewers (RAC, MAC, etc)

What is it? – the setting

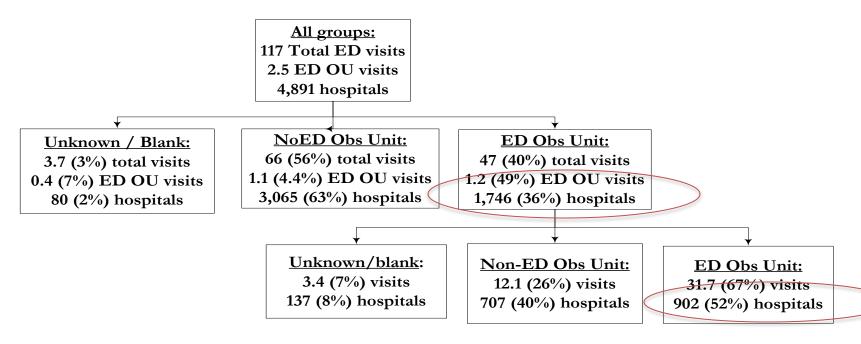
EXHIBIT 1

Hospital Settings In Which Observation Services Are Provided

	Setting	Description	Characteristics
	Type 1	Protocol driven, observation unit	Highest level of evidence for favorable outcomes Care typically directed by ED
	Type 2	Discretionary care, observation unit	Care directed by a variety of specialists Unit typically based in ED
	Type 3	Protocol driven, bed in any location	Often called a "virtual observation unit"
	Type 4	Discretionary care, bed in any location	Most common practice Unstructured care Poor alignment of resources with patients' needs

How many observation units are there? CDC / NHAMCS ED 2007 survey data

Wiler J, Ginde A, Ross M; Acad Emerg Med 2011



• ED dispositions:

 $-15\% = \text{``Stay''}: Admit to hospital } \underline{or} \text{ EDOU}$ 4/15 = 26%of people who 2% = CABhr hosp. (``Short stay'') ``stay'' 11% = >48 hr hosp.

- 13 % IP "admit"

What is it? – the scope

• U.S. 2010:

- 133.9 million ED visits (all payers, HCUP data)
 - 1.4 million observation visits (6.6% of all admits)
 - 19.7 million inpatient admissions
 - 4.5 million (23%) inpatient short stays, eligible for OU



What is it? – the scope

OIG: 2012 Medicare Data

for Evaluation and Impections

SUBJECT: Memorandum Report: Hospitals 'Use of Observation Steps and Short Impatient Steps for Medicare Bengletaries, OEI-02-12-00040

OBS, LOPS, and SIPS

- OBS: Observation volumes 2.1 million:
 - 1.5 million Obs => home
 - 0.6 million Obs => Inpatient
 - 78% began in the ED; 9% from cath lab/OR
- LOPS: Non-observation outpatient volumes:
 - 1.4 million Long OP stays
- SIPS: Short Inpatient Stays (≤2 nights)
 - 1.1 million SIPs
- Case mix was similar across all three groups!
 - Total = 4.6 million claims

2. Why should you do it?

- Better patient care
- Improved ED and hospital operations
- Economic benefits to patients, hospitals, payers

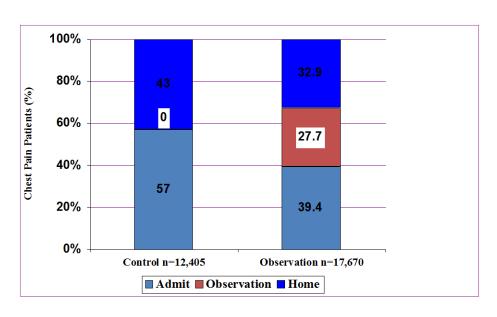


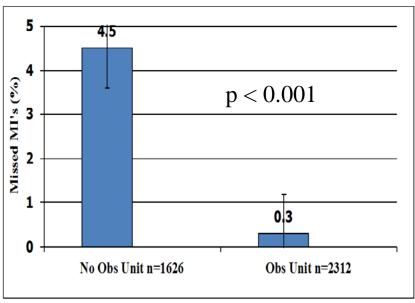
Why should you do it? Because it improves patient care!

- "Observation" is part of emergency medicine
- Fewer inappropriate discharges
- Fewer unnecessary admits
- Shorter length of stay
- Decreased cost
- Better patient and physician satisfaction
- Avoided "rework" by another department
- Improve hospital operations

Observation of selected conditions has been found to decrease the rate of missed diagnoses

- Decreased rate of missed MIs (4% to 0.4%) while admitting fewer patients.
 - Evidence Graff / CHEPER, Pope





State of the Art: Emergency Department Observation Units

Michael A. Ross, MD,* Taruna Aurora, MD,† Louis Graff, MD,‡ Pawan Suri, MD,† Rachel O'Malley, MD,§ Aderonke Ojo, MD,¶ Steve Bohan, MD∥, and Carol Clark, MD**

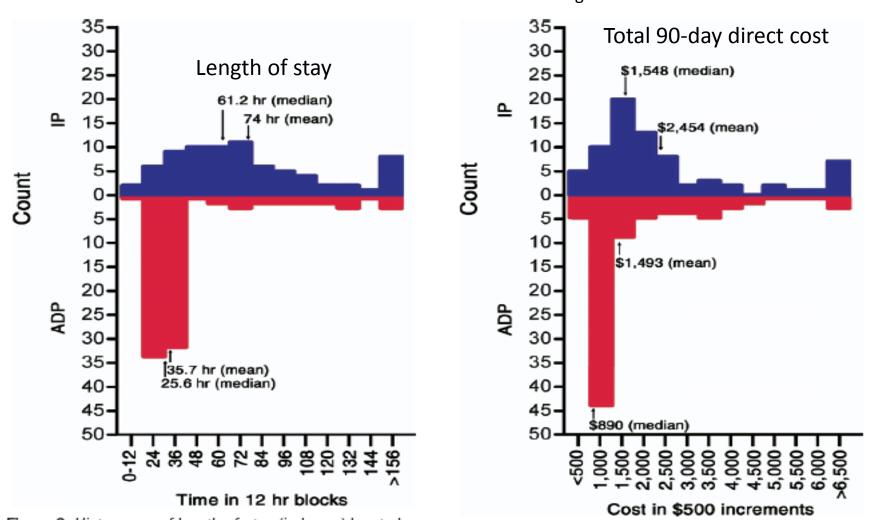
Condition / Year / Author	<u>N</u>	Primary Outcome
1. Syncope / 14 / Sun *	124	↓ admissions and LOS
2. Chest Pain / 10 / Miller *	110	↓ Cost (stress MRI)
<i>3. Atrial Fib</i> / 08 / Decker	153	↑ conversion to sinus
4. TIA / 07 / Ross	149	↓ LOS and cost
<i>5. Syncope</i> / 04 / Shen	103	\uparrow established diagnosis, \downarrow admissions
6. Asthma / 97 / McDermot	222	↓ admissions, no relapse ↑
7. Chest Pain / 98 / Farkouh	424	No difference cardiac events
8. Chest Pain / 97 / Roberts	165	↓ LOS and cost
<i>9. Chest Pain</i> / 96 / Gomez	100	↓ LOS and cost

(Crit Pathways in Cardiol 2012;11: 128–138)
*Added since published after this review

Transient Ischemic Attack (n=149) –

decreased LOS (25vs 61 hr) and cost (\$890 vs \$1510), with comparable or better clinical outcomes.

Ross MA, et al. An Emergency Department Diagnostic Protocol for Patients With Transient Ischemic Attack: A Randomized Controlled Trial. Ann Emerg Med 2007.



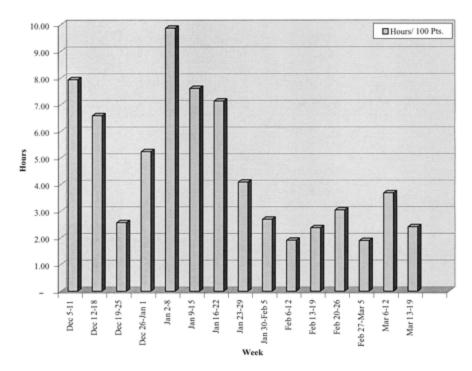
Effect of an ED managed acute care unit on ED overcrowding and EMS diversion

Kellen et al, Acad Emerg Med 2001;8:1095-1100

- Opened an EDOU
 - 54,000 visit/yr ED
- Before after study design looking at:
 - Patients who left without being seen
 - EMS diversion hours
- ▶ <u>RESULTS</u> Patients who left without being seen:
 - Before = 10.1% of ED
 - After = 5.0% of ED census

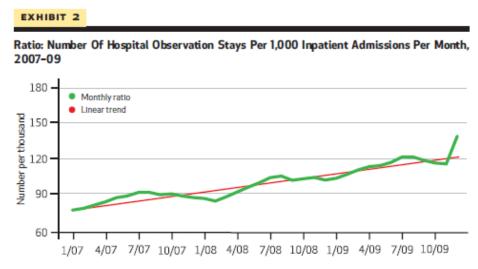
EMS diversion hours:

- Before = 6.7 hr/100 pts
- After = 2.8 hr/100 pts



Growth in observation services

- 2007 2009: Observation Services
 - 34% rise in Medicare ratio of observation to inpatient stays (Feng, Health Affairs, 2012; 31:6 1251-1259)



sources Centers for Medicare and Medicaid Services, 100 percent Medicare (Part A) inpatient and outpatient claims data, 2007–09. **NOTE** The trends shown are statistically significant (p < 0.01) according to t-tests using linear regression.

Trends in observation stays:

- 2007 2009: length of stay creep (Feng, Health Affairs, 2012; 31:6 1251-1259)
 - ->24 hours = 50%
 - ->48 hours = 10%

EXHIBIT 3

Duration Of Hospital Observation Stays: Average Number Of Hours Per Observation Episode Per Month, 2007-09



source Centers for Medicare and Medicaid Services, Medicare (Part A) outpatient claims data, 2007–09. **NOTE** The trends shown are statistically significant (p < 0.01) according to t-tests using linear regression.

Reasons for LOS creep . . .

 Patient selection - A growing pool of patients that did not meet Interqual criteria

Hospital fears – RAC and readmissions

Setting – type 4 setting

Protocol-Driven Emergency Department Observation Units Offer Savings, Shorter Stays, And Reduced Admissions

EXHIBIT 3

Observation Visit Lengths-Of-Stay Across Three Study Groups

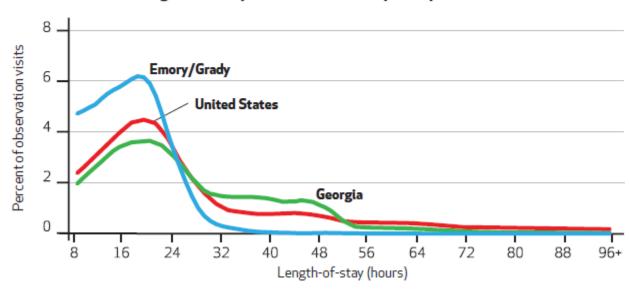


EXHIBIT 4

Costs Of Selected Types Of Inpatient Admissions In Georgia And The United States, 2010

	Georgia			US		
Type of admission	Number	Percent	Cost (\$ millions)	Number	Percent	Cost (\$ millions)
All	1,057,099	100.0	9,787	39,008,298	100.0	392,677
Beginning in ED	488,036	46.2	4,833	19,733,528	50.6	202,203
Beginning in ED and lasting no more than 2 nights	167,602	15.9	765	7,340,408	18.8	34,346
Beginning in ED, lasting no more than 2 nights, only observation-eligible conditions	106,077	10.0	459	4,544,836	11.7	20,229

Protocol-Driven Emergency Department Observation Units Offer Savings, Shorter Stays, And Reduced Admissions

- U.S. Savings Potential from Type 1 Units:
 - Observation patients \$950 Million / year
 - 38% shorter stays
 - 44% lower admit rates
 - Short Inpatients \$8.5 Billion / year
 - 11.7% of all admissions
 - Savings potential ED visits vs ED admissions:

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— Avoided ED visits = $2.3-3.4 Billion/yr
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– Avoided ED admits = \$5.5-8.5 Billion/yr

– Relative savings = 2.4-2.5 times greater

(avoided: admits vs ED visits)

Does observation cost *Medicare* less? YES!!! – almost 3 times less

- Over all:
 - SIPS = \$5.9 BILLION
 - Obs = \$2.6 BILLION
- By case:
 - SIPS = \$5,142 per case
 - Obs = \$1,741 per case
- Variation between conditions, however all favor observation over inpatient

Does observation cost *patients* more? NO!!!

- Average observation copay is about <u>half</u> inpatient copay
- Observation copay is less than inpatient 94% of the time
- Average SIPS copayment = \$725
- Average Obs copayment = \$401
 - 51% had self admin Rx costs = \$528
 - 6% (n=84K) paid more than IP deductible
 - 0.2% (n=3K) paid more than 2X IP deductible



SNF Breakdown:

- 3 days, but less than 3 IP days = 617,702
 - Received SNF services = 25,245 (4%)
 - Medicare paid (inappropriately) = 23,148 (92%)
 - Medicare payment = \$255M
 - Ave patient copay = \$2,735
 - Medicare did NOT pay = 2,097 (8%)
 - Ave patient copay = \$10,503
- Bottom Line:
 - SNF patients at risk represent 0.6% of whole group

BUT . . . IS THIS REALLY TRUE????



3. How do you do it?



- a) Making the case
- b) Physical design
- c) Protocols, guidelines, and order-sets
- d) Critical metrics utilization, quality, economic
- e) Staffing physician, APP, nurse, tech/sec
- f) Ancillary support
- g) Financial analysis

a) Making the case:

"Hospitalized but Not Admitted"

Sheehy AM et al. JAMA IM 2013

- Retrospective observational cohort study
- Setting: Type 4 (No type 1 obs unit)
 - 566 bed Academic Medical Center (U. Wisc)
- Time frame:36 months
- Population: Hospitalized patients
 - 43,853 patients
 - 10.4% for "observation"
 - Mean LOS = 33.3 hours (17% over 48 hours)
 - » Medical patients = 41.1 hours
 - » More medical, elderly, and female patients
 - Hospital Margin = LOSS of \$331 per case
- Conclusion: "... observation status"
 - Are they missing something???

Making the case



• Economic:

- Cost reduction = \$1.5 2.0K / case
 - = Baugh Health Affairs data \$1,572 / case
 - = Emory TIA data \$2,062 / case
- Revenue enhancement = \$3K/case
 - Baugh "options modeling" data \$2,908 / case
- Soft economics:
 - Risk reduction Penalties for re-admissions, RAC
 - Decrease ED overcrowding and diversion (1 admit / diversion hour)
- Organizational goals and objectives:
 - Locate your an OU fits in!
- Quality:
 - Patient satisfaction
 - Less patient financial risk (shorter stays, less SNF risk, faster admit)
 - Lower risk of inappropriate discharge
 - Standardized care quality compliance

b) Physical design



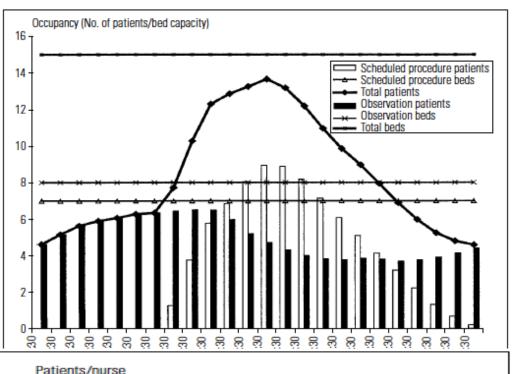
- Location
 - Proximate to the ED
 - Remote from the ED
- Features
 - Outpatient room building code -24 / overnight rule?
 - Cardiac monitoring
 - Privacy, TV, telephone, soft bed
 - Square feet?

b) Operational design



- Pure OU Only observation patients
- Open vs Closed OU (i.e. one specialty)
 - Anybody can admit (hold to standards)
 - Limited to a single specialty group (like ICUs)
 - Emergency Medicine
 - Hospitalists
 - Both
- Hybrid OU shared with:
 - Boarders not ideal, enables system failures
 - Scheduled procedure patients synergy, maximize use of nurse

Maximizing Use of the Emergency Department Observation Unit: A Novel Hybrid Design



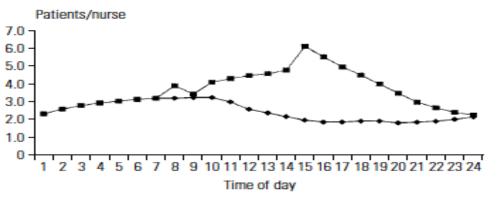
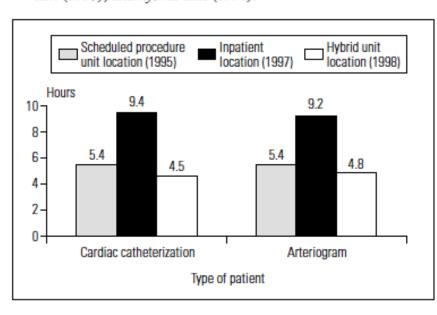


Figure 4.

Scheduled procedure patient length of stay by locations: 15-bed pure scheduled procedure unit (1995); alternative inpatient location (1997); and hybrid unit (1998).



Physical design – # beds: COMPLICATED

- Little's law (AEM) complicated
- Track existing volumes estimate 1pt/bed/d
 - # observation
 - # Short stays (< 2MN? 3d?)</p>
 - # ED boarders (d/c with LOS over 8 hours?)
 - Scheduled procedure patients (if hybrid unit)

Physical design - # beds: SIMPLE

- Percent ED census simple, fairly good
 - ~ 1patient/bed/day
 - Benchmark data:
 - 28% ED IP admit rate / 8% OU admit rate
 - Adjust up or down by proportions:
 - 32% ED − IP admit rate / 9% obs
 - 11% ED-IP admit rate / 3% obs
 - From this determine patients / day => # beds

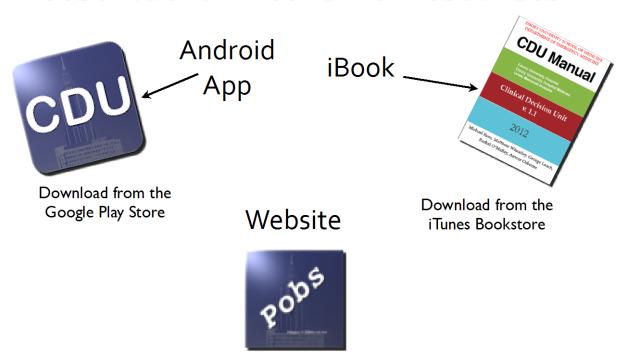
c) Protocols, guidelines, and order-sets



- Protocols / guidelines:
 - General and for the unit
 - Condition specific
- Guideline development:
 - Discovery
 - Design
 - Do
 - Data
- Protocols / Order sets derived from guidelines

Emory Protocols

Observation Medicine Resources



www.obsprotocols.org

all resources are free/CDU manual is for ipad or ipad mini only/ iphone app is coming soon/ feel free to email or ask any of your obs friends (Mike Ross, Matthew Wheatley, Anwar Osborne)

Patient selection

- See CDU guidelines for details
- Limited IS/SI
- Single well defined acute reason
- 70-80% discharge within 15 hours
- No exclusions
- Look at exclusion bar in bed request form

PATIENT SELECTION

#1 Focused goal:

b. Short Term Therapy

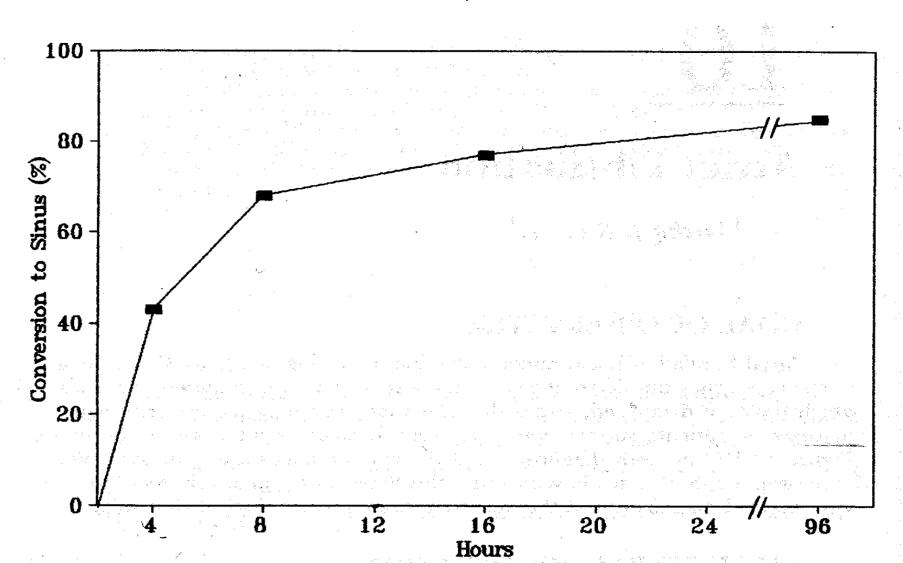
1. High probability (70-80%) of success within observation time frame. . .

2. Conditions requiring limited amount of service, consistent with what is available in unit.

Asthma, dehydration, uncontrolled diabetes, etc.

Short Term Therapy:

Rate of <u>spontaneous</u> conversion of acute onset atrial fibrillation **Am J Cardiol 1991;67:437–439**.



Patient selection considerations:

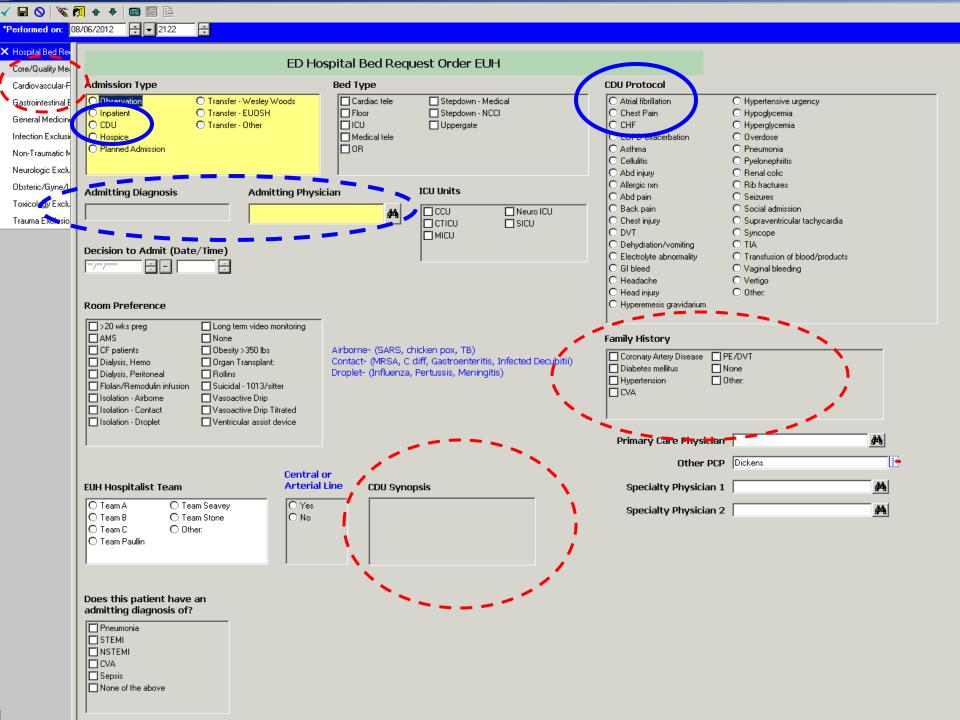
- Single problem principle:
 - Only one *acute* problem
 - Well defined problem and plan
- Specific patient issues:
 - Obstetric patients fetal monitoring
 - Pediatric patients <u>nursing</u> issue
 - Patients at risk of self harm:
 - Intoxicated or suicidal patients unit issue
 - Back pain >65
 - Acute gait disturbance
 - High failure rates CRF/HD, Pancreatitis, SCA

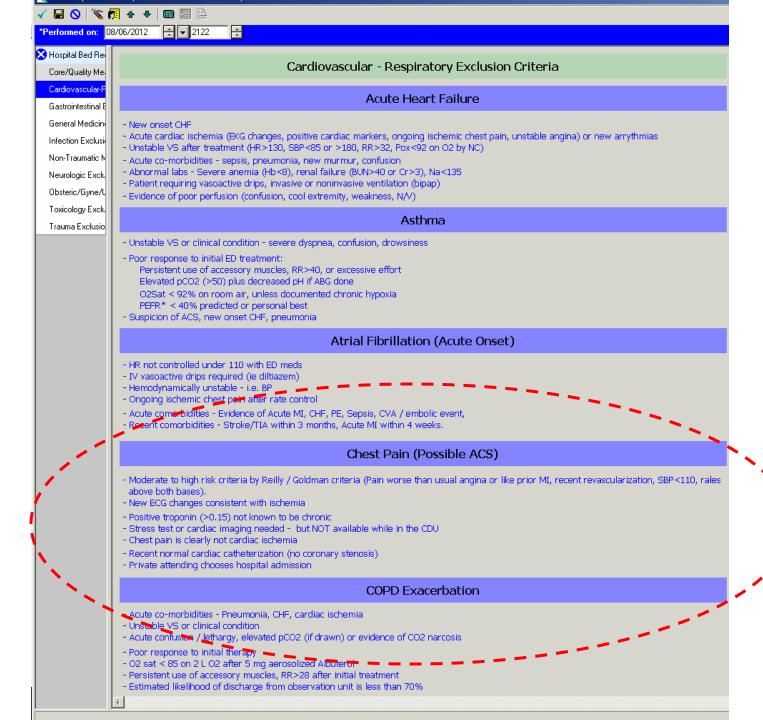
Patient Selection - <u>Exclusions</u>:

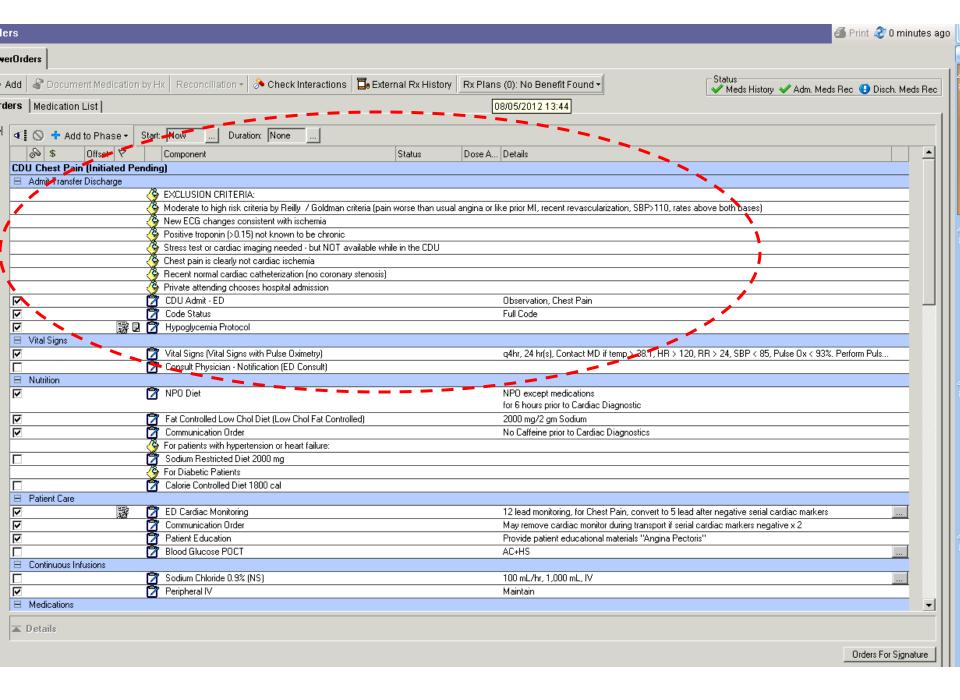
- Indecision
 - No clear diagnosis or plan documented
 - "Rounding rule":
 - "Would you want to round on this patient"?
- "Unwanted" patients
 - Inpatients A patient that clearly needs to be the admitted but a service does not want to admit
 - Drug seeking patients

Example:

How it happens at Emory . . .

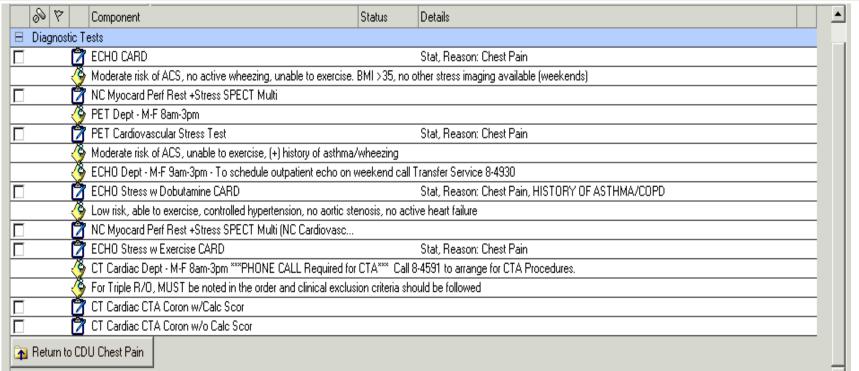






Order observation: "ADMIT TO EC OBSERVATION"

Component	Order Details	
VITAL SIGNS		
✓ Vital Signs	T;N, q4hr, 24, hr(s), Contact MD if temp > 38.1, HR > 120, RR > 24, SBP < 85	
✓ Pulse Oximetry per Nursing	T;N, Once, 24, hr(s), and continuous	
PATIENT CARE		
Communication Order	T;N, Admit to CDU under Observation status	
✓ Communication Order	T;N, Print dictation ASAP	
✓ Communication Order	T;N, Review home medications with patient and document	
Communication Order	T;N, Diabetic monitoring and sliding scale insulin as per protocol	



EDOU protocols:

- 1. Derived from guideline
- 2. Simplify work
- 3. Avoid delays & errors of omission

Observation documentation: & transfer of care

- Document emergency H&P
 - Include family history (forced at EHC)
 - Document closer to a level 5 (ie ROS, etc)



- SELECT THE CORRECT DIAGNOSIS FROM LIST
- CDU synopsis brief, include "IF-THEN" logic

NOTIFY THE CDU PROVIDER

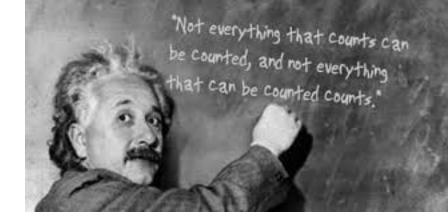
- Similar to sign out our admission (light)
- EHC sites AP on days, EP on nights
- Grady Blue zone doc covering CDU
- Discharge summary (follow CPT):
 - Course in the unit
 - A final exam
 - Preparation of discharge records
 - Arrangement for continuing care





d) Critical metrics – utilization, quality

- Utilization data source?
 - Electronic
 - Paper?
- Critical metrics:
 - Patient identifier
 - Gender and age (DOB)
 - Condition reason for observation
 - Times:
 - ED arrival
 - OU arrival
 - OU admit order boarding report?
 - OU departure
 - Departure order D2D report?
 - Disposition
 - Admit / Discharge

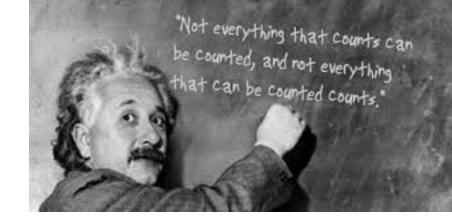


Critical Metrics:

- Volumes 0.9 1.1 pt/bed/day
 - Can not use 24/LOS due to variations in census by day and hour
- LOS 15-18 hours
- Percent discharge 70-90%
 - Under 70% observing patients that should be admitted from the ED?
 - Over 90% observing patients that should be discharged from the ED?

Critical metrics – utilization, quality

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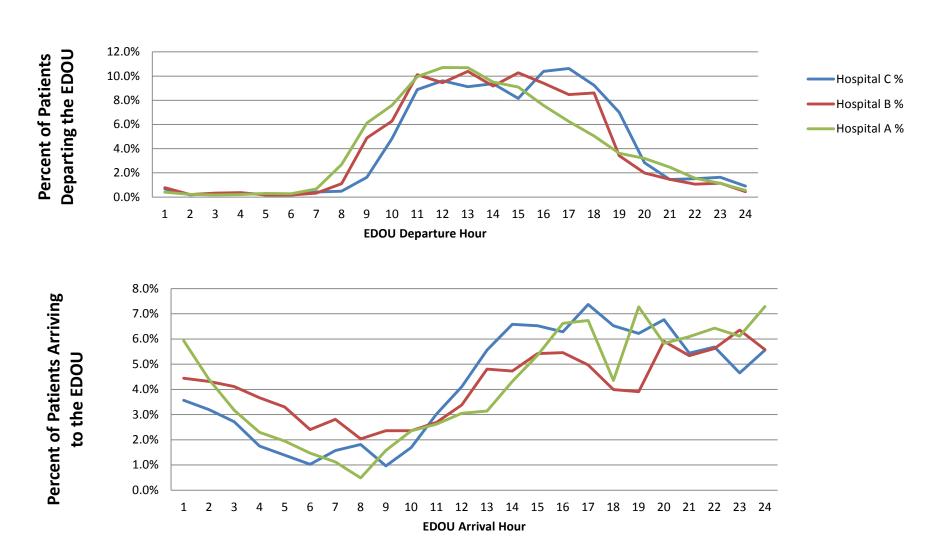
Sample report

EUH FY14 Q1 + Q2 (September 20	13 - Febru	uary 2014)			
CDII Brotocol Discussio	Total	%	Average ED LOS	Average CDU	Average Time from CDU Request to CDU Arrival
CDU Protocol Diagnosis Grand Total	Count 1328	Discharge 82%	(hours) 5.8	LOS (hours) 15.1	(minutes) 70.7
Chest Pain	462	85%	5.8	16.7	69
Dehydration/vomiting	115	83%	6.4	16.7	73
Abd pain	111	77%	7.1	19.0	75 75
Other	109	75%	6.5	13.2	78
TIA	94	83%	5.5	12.5	78
Syncope	66	86%	5.4	15.2	89
Cellulitis	52	85%	5.0	16.4	68
CHF	34	82%	5.8	15.6	95
Back pain	28	89%	6.1	10.9	72
Hyperglycemia	27	85%	6.2	14.2	84
Pyelonephritis	27	81%	6.8	14.7	81
Electrolyte abnormality	26	77%	5.9	15.4	30
Transfusion of blood/products	23	78%	5.5	12.6	89
Asthma	19	68%	5.6	12.4	63
Pneumonia	19	74%	5.5	14.7	80
Headache	17	88%	8.1	15.1	82
Vertigo	16	88%	5.8	13.0	74
GI bleed	14	71%	5.2	15.6	55
Renal colic	12	92%	5.1	12.2	67
COPD exacerbation	10	60%	4.6	15.5	68

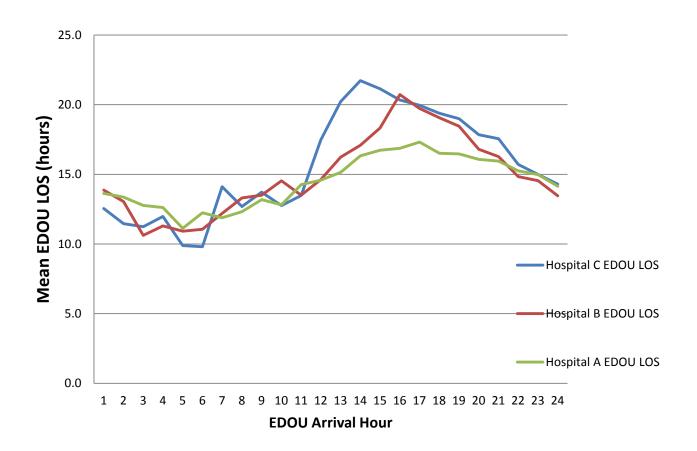
Critical Metrics Advanced Utilization and Quality

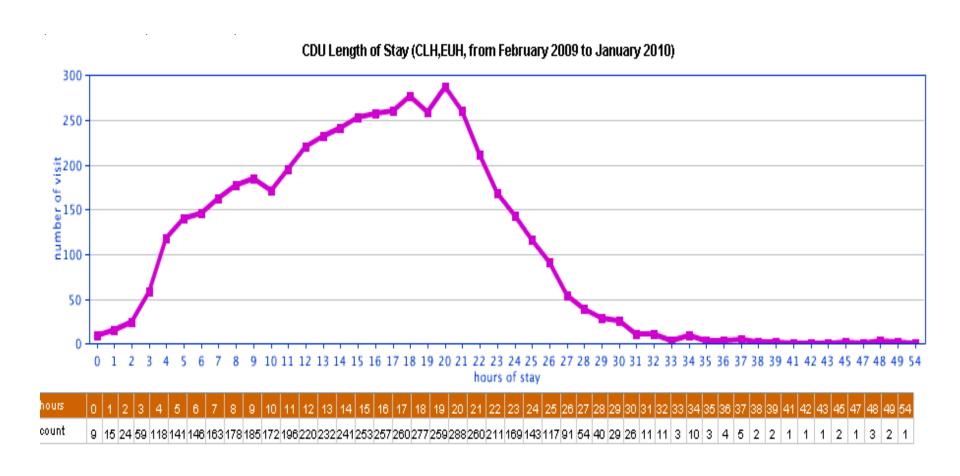
- Ancillary testing
 - Stress imaging, MRI, echo, etc
 - Allows tracking of LOS by test to detect delays
- ED boarding time: OU order to OU arrival
- D2D (discharge to departure) time: admit/discharge delays
- Recidivism
 - What timeframe 7, 14, or 30 day?
 - What type ED, Obs, Inpatient?
 - How many visits? -1, 2, 3+?
- Major outcomes:
 - ICU admissions
 - Death

EDOU Arrival / Departure patterns



EDOU LOS patterns





e) Staffing – Physician



- Two physician model
 - "Physician" defined by specialty and group (tax ID #)
 - Same as admitting to hospitalist second H/P
- One physician model Rounds before shift:
 - Same as structured sign-out
 - Staffing:
 - Morning heavy (~6min/patient if with an APP)
 - Afternoon light, lowest census
 - Midnights verbal sign out

Staffing our Obs Units

- "Closed" unit the buck stops with you
- Todicated attending (by shift) coverage
 - Rounds at beginning of shift (with nurse/ML)
 - Review chart, examine patient, discuss plan
 - Mostly mornings, afternoons brief, MN signout sheet
- "Close the loop". . . a final diagnosis <u>please</u>

What to do: A structured "sign out"

Days

 Take report from AP, review chart, examine everybody, sign AP note

Afternoons

 Only see patients not actively leaving (admit/discharge). Same as above.

Nights

Take signout. Be available to cover issues.

CDU Rounds

Time/	Time/ Grady Memorial Emory Midtown Emory University				
Hospitals	404-616-6448	404-686-3154	404-712-2908		
Hospitais	404-010-0440	404-000-3134	404-112-2900		
Morning Shifts	9am – 5pm Blue Zone attending. (12-8 attending when applicable) Round with CDU nurse.	7:30am – 3:30pm attending. Round with 6am – 6pm AP and CDU nurse. (1 st 45 min of shift)	8am – 4pm attending. Round with 6am – 6pm AP and CDU nurse. (1 st 45 min of shift)		
Afternoon Shifts	5pm- 1am Blue Zone attending. Round with CDU nurse and get sign-out from prior attending.	3:30pm - 11:30pm attending. Round with 6am - 6pm AP at 3:30pm and AP sign-out before leaving.	4pm – 12am attending. Round with 6am – 6pm AP at 3:30pm and AP sign-out before leaving.		
Night Shifts	11pm-7am Blue Zone attending. (After sign-out from the 5P-1A blue zone attending and CDU nurses. Sign out to the 7am Blue Zone doctor the next	11.30pm – 7.30am night attending to get sign-out from 3:30P- 11:30P attending.	12am – 8am night attending to get sign-out from 3:30P- 11:30P attending. Sign out to the 7:30am attending and AP.		
	morning, who will cover until the arrival of the 9am doctor	attending and AP.	atterioring direction.		

Staffing – Leadership



- Physician develop protocols, educate faculty, maintain utilization and quality, interface with other departments, monitor finance, run monthly meetings.
- APP assist physician director with other APPs and unit monitors and operations.
- Nursing director train staff, maintain staffing, implement protocols.

Staffing – APP



- Benchmark estimates 45-60 minutes/patient
- Staff:
 - heavy in the morning
 - Light in afternoon
 - Brief heavy in late afternoon / early evening
- Dual function roles?
 - Administrative duties (call backs)
 - Fast track
 - Triage
 - Main ED

Staffing - Nursing, tech, sec



- RN benchmark data:
 - 4-5 patient / nurse
 - May maximize use of nurse in afternoon with hybrid model (scheduled procedure patients)

f) Ancillary support

- Cardiac imaging
 - Stress lab
 - -cCTA
 - Echo
- MRI
- Consultants
 - Cardiology
 - Neurology



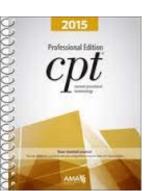
4. Do you get paid??? or - g). Financials . . .

- Physician staffing models
- Coding and billing
- Equity analysis
- Cost sharing opportunities

Physician staffing models

 CPT: A "physician" can not bill 2 separate E/M codes on the same calendar day

- A "physician" is defined by:
 - Group (tax ID #)
 - Specialty (designated recognized codes)



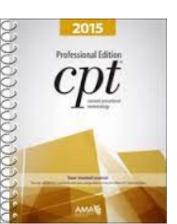
Physician staffing models

- Two "physician" model (like admitting to a hospitalist)
 - Pro more RVUs
 - Con legal / compliance hurdles, questionable medical necessity, 2 H/Ps for somebody going home in 15 hours?, need volume to support if solo (15-20), interest levels
- One "physician" model (like a structured sign-out)
 - Pro simpler, lower staffing cost, intuitively fits model, only one H/P and one discharge summary, less compliance risk.
 - Less revenue (cost share midlevel with hospital?),
 dependant on the discharge code to support

CODING / BILLING ISSUES

5 EMERGENCY CPT CODES:

- 99281-99285
- Independent of time of day or length of stay
- No separate payment for the work of "discharging" a patient
 - Observation and Inpatient CPT codes recognize the work of discharging a patient
 - "Discharge" work is over and above the work of the initial "H&P" (or initial evaluation and management)
 - Initial evaluation and management (or "H&P") documentation requirements and payment levels are similar for emergency, observation, and inpatient CPT codes.

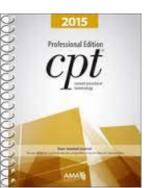


Billing **Observation** professional services

7 OBSERVATION CPT CODES:

- Two day case:
 - 99218 20 Initial day of observation care
 - 99217 Observation care discharge day management
- One day case:
 - 99234 36 Observation or inpatient hospital care, for the evaluation and management of a patient including admission and discharge on the same date:

These codes basically combine discharge (99217) and initial observation care (99218 - 20) into one code (99234 - 36) for cases which come and go on the same day.



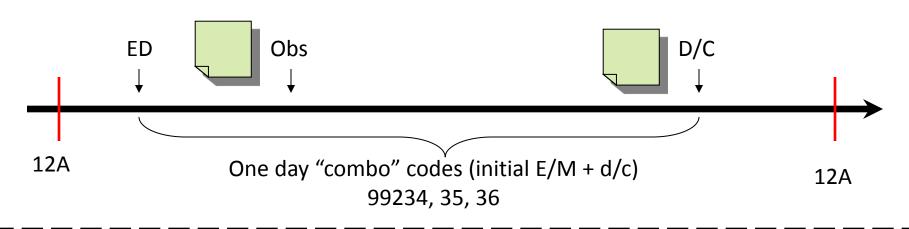
Emergency & Observation CPT E&M Codes:



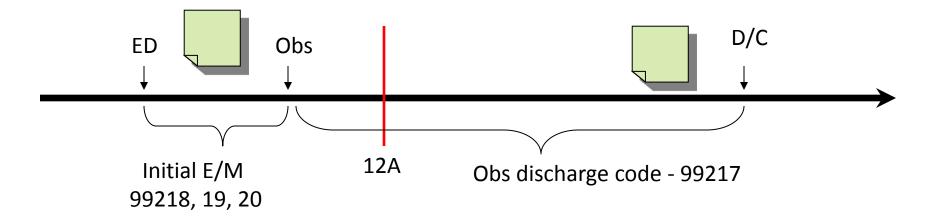
Service	CPT codes	Required Documentation **			2014
		History	Physical	<u>M.D.M.</u>	Total RVUs
Emergency level 1	99281	PF	PF	S	0.61
Emergency level 2	99282	EPF	EPF	L	1.19
Emergency level 3	99283	EPF	EPF	M	1.73
Emergency level 4	99284	D	D	M	3.30
Emergency level 5	99285	C	C	H	4.85
Observation Discharge	99217	+	+	+	2.03
Observation level 1	99218	D or C	D or C	S or L	2.78
Observation level 2	99219	C	C	M	3.80
Observation level 3	99220	C	C	H	5.20
Same Day Obs / dschg 1	99234	D or C	D or C	S or L	3.79
Same Day Obs / dschg 2	99235	C	C	M	4.74
Same Day Obs / dschg 3	99236	C	C	Н	6.12

Two scenarios – 1 vs 2 days

ONE DAY SCENARIO:



TWO DAY SCENARIO:



Financial analysis - Professional



- Meet with your coding company to clarify observation coding and rules
- Physician CPT code accounting
 - CDU census = 2day + 1day code volumes
 - Do not count 99217
 - 99217 volume = [99218+99219+99220] volumes
 - Case mix distribution (2-day and 1day cases)

Equity analysis and cost sharing

- Cost per case:
 - Physician time
 - APP time
- Incremental revenue per case ~2.5 tRVU/case
 - Initial E/M (or "H/P") \sim 0.5 1.0 tRVU
 - Discharge code (99217 or combined) ~2.0 tRVU
- Negative equity? Cost share APP with hospital
 - They do not practicing independently
 - The hospitals profits from this investment:
 - Cost savings \$1-2K/case
 - Revenue enhancement backfill admissions \$2-3K/case
 - Indirect benefits RAC, readmissions, malpractice risk
 - APP cost /case is minimal by comparison

Summary

 Well run Type 1 Observation Units provide a "win-win" for patients, hospitals, providers, and hospitals

 Applying key principles to type 1 observation units provide favorable clinical outcomes

 Type 1 Observation Units decrease patient and hospital financial risk

Questions???



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