Functional Limitation Reporting for Therapy Services under Medicare Part-B

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FUNCTIONAL LIMITATION REPORTING OVERVIEW



History of Medicare Therapy Caps and Reform Payment in Therapy Services

MEI-TRHCA MMSEA MIPPA PPACA TPTCCA

 Mandated CMS to collect functional data on beneficiaries

2012

MCTRJCA

BBA 1997

- Therapy cap
- Call for reformed therapy payment



Functional Limitation Reporting Background

- Middle Class Tax Relief Act of 2012
 - CMS was mandated to collect information regarding the beneficiaries on the claim form by January 1, 2013:
 - Function and condition
 - Therapy services furnished
 - Outcomes achieved on patient function
- CMS intends to utilize this information in the future to reform payment for outpatient therapy services



Functional Limitation Reporting: Background

- CMS issued proposed Medicare physician fee schedule rule on July 6, 2012 with proposal for functional reporting. Received over 200 comments.
- CMS issued final rule on November 1, 2012 which made many changes based on comments.
- The effective date of provisions in the rule regarding functional reporting is January 1, 2013; although CMS will allow testing for 6 months.



Program Basics: Who

- All practice settings that provide outpatient therapy services:
 - PT, OT, and SLP services furnished in
 - hospitals
 - critical access hospitals
 - skilled nursing facilities
 - CORFs
 - rehabilitation agencies
 - home health agencies
 - private offices of therapists, physicians and non-physician practitioners



Program Basics: What

- Therapy service providers will submit nonpayable G-codes with severity modifiers on their claims for the current status and projected goal
- Functional limitation categories include:
 - Mobility: walking and moving around
 - Changing and maintaining body position
 - Carrying, moving and handling objects
 - Self care
 - Other



Program Basics: When

- Functional limitation G-codes will be submitted for the primary limitation:
 - At the outset of the therapy episode
 - At a minimum every 10th visit
 - At a formal re-evaluation or evaluation
 - At discharge/ end reporting (unless the patient self discharges prior to formal discharge visit)
- A subsequent functional limitation may be reported if care continues to address the subsequent limitation after you end reporting of the primary limitation



Functional Limitation Reporting

Outset

- Current functional status
- Projected functional goal

Every 10th Visit

- Current functional status
- Projected functional goal

Re-Evaluation

- Current functional status
- Projected functional goal

Discharge/ End Reporting

- Discharge functional status
- Projected functional goal

Reporting of Subsequent Limitation*

- Current functional status
- Projected functional goal

* Reporting of a subsequent limitation only occurs in the instance where the primary limitation resolves and the patient continues care for treatment of a subsequent limitation



Program Basics: How

- Therapists will use a valid and reliable assessment tool(s) and/or objective measure(s) in determination of the severity of the functional limitation
 - Multiple tools may be used
 - Therapist judgment may be used in the severity modifier determination in combination with data gathered
 - Documentation of the G-codes and the rationale for selection of severity must be included in the medical record



Reporting Timeline

January 1- June 30, 2013

 6 month testing period for functional limitation data submission

July 1- December 31, 2013

 Claims will be returned unpaid if functional information is missing



FUNCTIONAL LIMITATION REPORTING DETAILS



Nonpayable G-codes

- G-codes are based on the International Classification of Functioning, Disability and Health (ICF)
 - Functional limitation: activity limitations + participation restriction
- Specific categories plus an other category
- Therapist can choose the most appropriate category that applies or choose other



Nonpayable G-codes Guide

Code	Information Communicated	When Reported
GXXX	Current functional status	 Therapy episode outset (initial evaluation) Reporting intervals (every 10th visit) Formal re-evaluation (if performed during the episode)
GXXX	Projected goal functional status	 Therapy episode outset (initial evaluation) Reporting intervals (every 10th visit) Discharge from therapy OR to end reporting
GXXX	Discharge functional status	•Discharge from therapy OR to end reporting



Nonpayable G-codes CY2013

	Mobility: Walking & Moving Around						
G8978	Mobility: walking & moving around functional limitation, current status, at therapy episode outset and at reporting intervals						
G8979	Mobility: walking & moving around functional limitation, projected goal status, at therapy episode outset, at reporting intervals, and at discharge or to end reporting						
G8980	Mobility: walking & moving around functional limitation, discharge status, at discharge from therapy or to end reporting						
	Changing & Maintaining Body Position						
G8981	Changing & maintaining body position functional limitation, current status, at therapy episode outset and at reporting intervals						
G8982	Changing & maintaining body position functional limitation, projected goal status, at therapy episode outset, at reporting intervals, and at discharge or to end reporting						
G8983	Changing & maintaining body position functional limitation, discharge status, at discharge from therapy or to end reporting						



Nonpayable G-codes CY2013

	Carrying, Moving & Handling Objects						
G8984	Carrying, moving & handling objects functional limitation, current status, at therapy episode outset and at reporting intervals						
G8985	Carrying, moving & handling objects functional limitation, projected goal status, at therapy episode outset, at reporting intervals, and at discharge or to end reporting						
G8986	Carrying, moving & handling objects functional limitation, discharge status, at discharge from therapy or to end reporting						
	Self Care						
G8987	Self care functional limitation, current status, at therapy episode outset and at reporting intervals						
G8988	Self care functional limitation, projected goal status, at therapy episode outset, at reporting intervals, and at discharge or to end reporting						
G8989	Self care functional limitation, discharge status, at discharge from therapy or to end reporting						



Nonpayable G-codes CY2013

	Other PT/OT Primary Functional Limitation
G8990	Other physical or occupational primary functional limitation, current status, at therapy episode outset and at reporting intervals
G8991	Other physical or occupational primary functional limitation, projected goal status, at therapy episode outset, at reporting intervals, and at discharge or to end reporting
G8992	Other physical or occupational primary functional limitation, discharge status, at discharge from therapy or to end reporting
	Other PT/ OT Subsequent Functional Limitation
G8993	Other physical or occupational subsequent functional limitation, current status, at therapy episode outset and at reporting intervals
G8994	Other physical or occupational subsequent functional limitation, projected goal status, at therapy episode outset, at reporting intervals, and at discharge or to end reporting
G8995	Other physical or occupational subsequent functional limitation, discharge status, at discharge from therapy or to end reporting



Use of the "Other" category

- If the patient's limitation is not defined by one of the four categories
- When a patient receiving therapy services that are not intended to treat a functional limitation (wound care, lymphedema)
- When the therapist uses a composite functional assessment tool (such as AMPAC or FOTO) and does not clearly represent a functional limitation as defined by the four categorical codes



Severity Modifiers

- 7 point scale
- Therapist will use valid and reliable functional assessments and/or objective measures in addition to their clinical judgment in selecting the severity modifier and must document accordingly
- If therapy services are not intended to address a functional limitation then use "other" G-code and the CH modifier.



Severity Modifiers CY2013

Modifier	Impairment Limitation Restriction
СН	0 percent impaired, limited or restricted
CI	At least 1 percent but less than 20 percent impaired, limited or restricted
CJ	At least 20 percent but less than 40 percent impaired, limited or restricted
CK	At least 40 percent but less than 60 percent impaired, limited or restricted
CL	At least 60 percent but less than 80 percent impaired, limited or restricted
CM	At least 80 percent but less than 100 percent impaired, limited or restricted
CN	100 percent impaired, limited or restricted

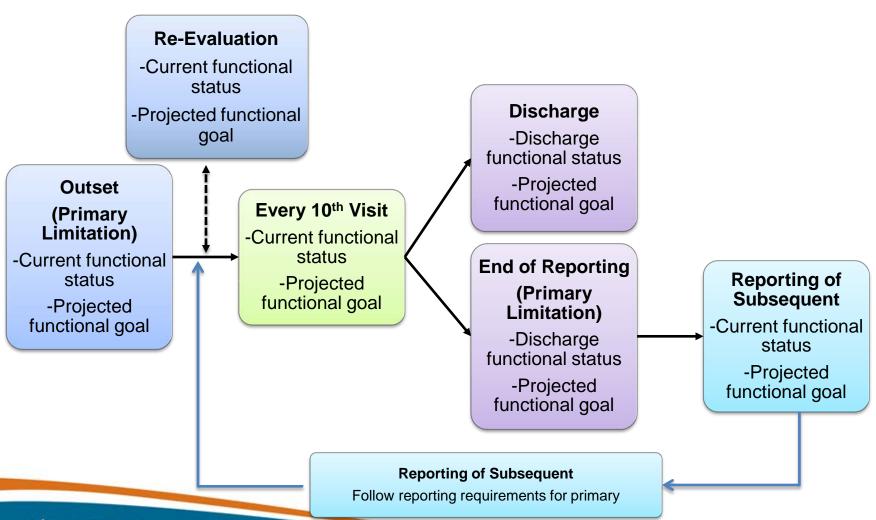


Reporting Frequency

- G-codes are reported throughout care at specific intervals
- Report only on one limitation (primary)
- You may report on a second limitation but not simultaneously
 - If a patient is seen for a second condition beyond the resolution of first then you will report a second (subsequent) limitation



Functional Limitation Reporting





Example of Required Reporting

	Mobility	v: Walking Around	& Moving	Other I	No Reporting		
	G8978- Current	G8979- Goal	G8980- Discharge	G8990- Current	G8991- Goal	G8992- Discharge	No code submitted
Evaluation/ Beginning of reporting period #1	X	X					
Treatment days 2-9							Χ
End of reporting period #1 (10 th visit)	X	Х					
Reporting period #2 begins							X
Treatment days 12-13							X
Treatment day14/ End of reporting on Walking & Moving		X	X				
Begin Reporting Period for other primary				X	X		
Treatment days 16-19							X
End of reporting period #2 (20 th visit)/ Discharge					X	X	

Documentation

- For each date of service that functional reporting is required the therapist must document in the medical record the specific nonpayable G codes and severity modifiers used to report the functional limitation.
- The therapist must document how the modifier selection was made (e.g. through use of one functional assessment tool; use of more than one tool; or use of clinical judgment to determine modifier)



Claim Submission

- Reported as a separate line item
- Functional limitation data is comprised of three pieces of information:
 - G code
 - Severity modifier
 - Therapy modifier (GP, GO, GN)
 (<u>Do NOT</u> report the KX or 59 modifiers on this line item)
- Nonpayable code
 - \$0.01 institutions
 - \$0.00 private
- Multiple page claims:
 - Complete total for item 28 on the last CMS-1500 claim form



Claims Example: 1500

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01	10	13	01	10	13	11		G8978	GP	CL			0.00			NPI	123	4567890
01	10	13	01	10	13	11		G8979	GP	CI			0.00			NPI	123	4567890
01	10	13	01	10	13	11		G8420					0.00			NPI	123	34567890
01	10	13	01	10	13	11		G8427					0.00			NPI	123	34567890
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Claims Example: UB-04

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	42 REV. CD.	43 DESCRIPTION	44 HCPGS / RATE / HIPPS CODE	45 SERV. DATE	46 SERV. UNITS	47 TOTAL CHARGES	48 NON-COVERED CI	HARGES	49
1	420	PT Evaluation	97001GP	011013	1	75	00	-	
2	420	PT Treatment	97110GP	011013	1	28	72		
3	420	Mobility Current Status	G8978CLGP	011013		00	01		
4	420	Mobility Goal Status	G8979CIGP	011013		00	01		
5	420	PT Treatment	97110GP	011113	1	28	72		
6	420	PT Treatment	97116GP	011113	1	25	42		
7	420	PT Treatment	97110GP	011413	2	57.	44		
8	420	PT Treatment	97110GP	011613	1	28	72		
9	420	PT Treatment	97116GP	011613	1	25	42		
10	420	PT Treatment	97110GP	011813	2	57	44	-	
11	420	PT Treatment	97112GP	012113	2	60	00		
12	420	PT Treatment	97110GP	012313	1	28	72		
13	420	PT Treatment	97116GP	012313	1	25	42		
14	420	PT Treatment	97112GP	012513	2	60	00		
15	420	PT Treatment	97110GP	012813	2	57	44	-	
16	420	PT Treatment	97116GP	013013	1		42		
17	420	PT Treatment	97110GP	013113	2	57	44		
18	420	Mobility Current Status	G8978CKGP	013113		0 (01		
19	420	Mobility Goal Status	G8979CIGP	013113		0	01		
20	430	OT Evaluation	97003GO	011613	1	75	00		
21	430	Self Care Current Status	G8987CJGO	011613		0	01		
22	430	Self Care Goal Status	G8988CIGO	011613		0	01		
23	0001	PAGE 1 OF 2	CREATION DATE	020913	TOTALS		38	:	
	50 PAYER NA	ME 51 HEALTH P	INFO BEN.	PRIOR PAYMENTS	55 EST. AMOUNT D	OUE 56 NPI	888888888		



	Functional Limitatio	on Reporting: Step by Step
	Check Point	Action Required
1.	Patient visit: If patient is at one of the indicated visits then move to check point 2 otherwise STOP	□Evaluation (1 st visit) □Every 10 th visit □ Re-evaluation (if performed) □Discharge OR end of reporting
2.	Determine the primary functional limitation:	□ Mobility: walking and moving around □ Changing and maintaining body position □ Carrying, moving and handling objects □ Self care □ Other
3.	Pick the appropriate G-codes	□Current functional status OR □Discharge functional status AND □Projected functional goal
4.	Pick the appropriate severity modifier	□Pick a modifier for current or discharge functional status AND □Pick a modifier for projected goal
5.	Submit functional limitation codes for the current/ discharge status AND projected goal on claims	□G-code □Severity modifier □Therapy modifier

Unique Clinical Situations

- Acute care:
 - Observation beds
 - Inpatient stay billed under Medicare part B
- Evaluation only (one visit/ consultation visit):



CASE EXAMPLE



Scenario for Patient s/p CVA

- 83 y/o female four week s/p ischemic event of the left middle cerebral artery resulting in right hemiplegic and mild aphasia
- Previous therapy includes inpatient rehabilitation
- Co-morbidity of severe osteoporosis with wrist, hip, and spinal compression fractures within past year
- Chief complaints include assistance needed to walk short distance and weakness or right arm
- Reports fatigue with minimal exertion



Initial Evaluation Functional Data Requirements

Determine current primary functional limitation

- Select an appropriate functional assessment tool(s) or objective measure(s)
 - Determine the category of the primary functional limitation
 - Determine the severity of limitation

Determine the projected goal

- Based on the current functional limitation status and other patient information
 - Determine the projected goal

Report the functional limitation data

- Current status with severity modifier
- Projected goal with severity modifier

Determine Current Functional Status

Specific test and measures administered include the following:

- OPTIMAL
- Berg balance test
- 4 meter walk



OPTIMAL

- 22 item questionnaire
- Each item can be scored for difficulty and confidence on a 1-5 scale
 - 1=Able to do without any difficulty/Fully Confident
 - 5= Unable to do/Not confident
- Identifies 3 activities that they would most like to do without difficulty

Guccione A, et al. Development and testing of a self-report instrument to measure actions: Outpatient Physical Therapy Improvement in Movement Assessment Log. *Physical Therapy*. 2005;85,6:515-530.



Berg Balance Test

- 14 items test
- five-point scale, ranging from 0-4. "0" indicates the lowest level of function and "4" the highest level of function. Total Score = 56
- 41-56 = low fall risk
- 21-40 = medium fall risk

Thorbahn L, Newton R. Use of the Berg Balance Test to predict Falls in elderly persons. Physical Therapy. 1996; 76:576-583.



4 Meter Walk

- Walks 4 meters at usual speed (2 trials)
- Usual pace for female age 70-85 is 0.98 meter per sec.
- Decrease pace indicates increased risk for fall, decreased community ambulation, and decreased independence with ADLs

Bohannon R. Comfortable walking speed: Norms for adults derived using meta-analysis. NIH Toolbox Conference: Bethesda, MD. 2008.

Perry J, Garrett M, Gronley JK, Mulroy SJ. Classification of walking handicap in the stroke population. *Stroke*. 1995;26:982-989.



Initial Evaluation Functional Measurement Data

Test	Key findings	Score	Severity translation	Functional limitation category
OPTIMAL	Patient identified: •walking outdoors* •climbing up stairs •carrying objects	9 (on primary item*)	70 percent limitation: At least 60 but less than 80% impaired, limited or	Mobility: walking & moving around G8978-CL
Berg balance test		29/56	restricted - CL modifier	
4 meter walk	Walks with close supervision and use of cane	4 meter walk at 0.6 m/sec		



Determine the Projected Goal

- Prior to CVA lived in home w husband and was independent in ADLs and driving
- Goal is to return to this setting and prior activities
- Projected goal is at least 1 percent but less than 20 percent impaired, limited or restricted (CI modifier)
- G8979-CI



Initial Evaluation Functional Limitation Documentation

Patient's primary goal for PT is to be able to walk outdoors (G8978) with minimal help. Her current impairment level is 70% (CL) based on her OPTIMAL, Berg balance, and 10 meter walk scores. She is expected to be able to walk outside her home with less than 20% (G8979 CI) impairment after 8 weeks of therapy.



Example of Charge Form for Initial Evaluation Visit

		92	ATURE	OF ILL	NESS O	R INJUR	Y (Relat	e Items 1, 2, 3 or 4	to Item 24	E by Line)	_	+	22. MEDICAID CODE				GINAL R	EF. NO.
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01	10	13	01	10	13	11		G8978	GP	CL			0	00			NPI	987654321
01	10	13	01	10	13	11		G8979	GP	CI			0	00			NPI	987654321
01	10	13	01	10	13	11		G8427					0	00			NPI	987654321
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25. FED	ERAL	TAX I.D.	NUMB	ER	SSN	EIN	26. P	ATIENT'S ACCOL	JNT NO.		CEPT ASS r govt. claims /ES	SIGNMENT? , see back) NO	28. TOTAL CH	ARGE 117			JNT PAI	00 s 117 00

10th Visit Functional Data Requirements

Determine current primary functional limitation

- Re-administer the functional assessment tool(s) or objective measure(s)
 - Determine the severity of limitation

Determine the projected goal

• Re-verify the projected goal

Report the functional limitation data

- Current status with severity modifier
- Projected goal with severity modifier

10th Visit Description

- The patient is happy with her progress
- She is able to walk with only close supervision now demonstrating slightly greater walking speed
- She still notes some decreased confidence walking outside
- Her balance is improved especially with single limb stance activities



10th Visit Functional Measurement Data

Test	Key findings	Score	Severity translation	Functional limitation category
OPTIMAL	Patient identified: •walking outdoors* •climbing up stairs •carrying objects	5 (on primary item*)	40 percent limitation: At least 40 but less than 60 %impaired, limited or	Mobility: walking & moving around G8978-CK
Berg balance test		40/56	restricted - CK modifier	
4 meter walk	Walks with close supervision without an assistive devise	4 meter walk at 0.8 m/sec		



10th Visit Documentation

Patient has improved in safety with her mobility. Her current impairment level for walking around (G8978) is 40% (CK) based on her OPTIMAL, Berg balance, and 10 meter walk scores. She is expected to be able to walk outside her home (G8979) with less than 20% (CI) impairment at time of discharge from physical therapy.



Example of Charge Form for 10th Visit

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Discharge Visit Functional Data Requirements

Determine discharge primary functional limitation

- Re-administer the functional assessment tool(s) or objective measure(s)
 - Determine the severity of limitation

Determine the projected goal

• Re-verify the projected goal

Report the functional limitation data

- Discharge status with severity modifier
- Projected goal with severity modifier

Discharge Visit Description

- Visit 12
- The patient is much more confident moving around outside
- She is able to walk independently at a speed that is appropriate for community participation
- Her balance is improved overall and her Berg score indicates she has a low fall risk



Discharge Visit Functional Measurement Data

Test	Key findings	Score	Severity translation	Functional limitation category
OPTIMAL	Patient identified: •walking outdoors* •climbing up stairs •carrying objects	3 (on primary item*)	10 percent limitation: At least 1 but less than 20 %impaired, limited or	Mobility: walking & moving around G8980-CI
Berg balance test		46/56	restricted - CI modifier	
4 meter walk	Walks independently without an assistive devise	4 meter walk at 1.0 m/sec		



Discharge visit documentation

Patients has improved in safety with her mobility. Her current impairment level for walking around (G8980) is 10% (CI) based on her OPTIMAL, Berg balance, and 10 meter walk scores. She has achieved her goal to be able to walk outside her home (G8979) with less than 20% (CI) impairment at time of discharge from physical therapy.



Example of charge form for Discharge visit

	342	92	ATURE	OF ILLI	NESS O	R INJUR	Y (Relat	e Items 1, 2, 3 or 4	to Item 24	E by L	ine)		+	22. MEDICAID CODE 23. PRIOR AU			ORIG	SINAL RI	EF. NO.		
2. L 24. A.	DA From DD	TE(S) C	DF SER	VICE To DD	YY	B. PLACE OF SERVICE	C. EMG	4. L D. PROCEDURE (Explain Unit		ımstan		IES	E. DIAGNOSIS POINTER	F. \$ CHARGI	ΞS	G. DAYS OR UNITS	H. EPSDT Family Plan	I. ID. QUAL.		J. RENDERING PROVIDER ID.	
02	26	13	02	26	13	11		97110	GP				1	34	00	1		NPI	987	654321	
02	26	13	02	26	13	11		97112	GP				1	35	00	1		NPI	987	654321	
02	26	13	02	26	13	11		97530	GP				1	37	00	1		NPI	987	654321	
02	26	13	02	26	13	11		G8980	GP	СІ				0	00			NPI	9876	554321	
02	26	13	02	26	13	11		G8979	GP	CI				0	00			NPI	987	654321	
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25. FE	DERAL	TAX I.D	. NUME	BER	SSN	I EIN	26. F	PATIENT'S ACCO	UNT NO.	1	27. ACCEP For govt YES	CT ASS	SIGNMENT? , see back) NO	28. TOTAL CH	ARGE 106		9. AMOI \$	UNT PAI	00	30. BALANCE \$ 106	DUE 6 00



Summary of reporting

Initial Eval	uation Visit	10 th	Visit	D/C Visit			
G-code	Modifier	G-code	Modifier	G-code	Modifier		
G8978	CL	G8978	CK				
G8979	CI	G8979	CI	G8979	CI		
				G8980	CI		

Mobility:	Walking & Moving Around
	Mobility: walking & moving around functional
G8978	limitation, current status, at therapy episode outset and at reporting intervals
G8979	Mobility: walking & moving around functional limitation, projected goal status, at therapy episode outset, at reporting intervals, and at discharge or to end reporting
G8980	Mobility: walking & moving around functional limitation, discharge status, at discharge from therapy or to end reporting

Modifier	Impairment Limitation Restriction
СН	0 percent impaired, limited or restricted
CI	At least 1 percent but less than 20 percent impaired, limited or restricted
CJ	At least 20 percent but less than 40 percent impaired, limited or restricted
CK	At least 40 percent but less than 60 percent impaired, limited or restricted
CL	At least 60 percent but less than 80 percent impaired, limited or restricted
СМ	At least 80 percent but less than 100 percent impaired, limited or restricted
CN	100 percent impaired, limited or restricted



CONCLUSION



Resources

- APTA website
 - http://www.apta.org/Payment/Medicare/CodingBilling/ FunctionalLimitation/
- CMS transmittals R260CP & R163BP
 - http://www.cms.gov/Regulations-and-Guidance/Guidance/Transmittals/2012-Transmittals-Items/R2603CP.html
 - http://www.cms.gov/Regulations-and-Guidance/Ghttp://www.cms.gov/Regulations-and-Guidance/Guidance/Transmittals/2012-Transmittals-Items/R163BP.html



Questions



