Anytime a physician is out of the office, a patient isn’t being seen, and revenue is not being produced. Most hospitals and practices use locum tenens physicians to ensure patients have access to top-quality care and revenue isn’t being lost due to a vacancy.

At LocumTenens.com, we are often asked about working with payers to bill for services provided by locum tenens physicians. There are a few rules to be aware of, and we’ve attempted to simplify them for you through the advice of billing expert Cheryl Adams, CPC, Team Lead for Coding at leading healthcare billing company M-Scribe Technologies.

**Medicare Guidelines**

The Center for Medicare and Medicaid Services (CMS) Medicare Claims Processing Manual provides guidance on the usage of locum tenens practitioners during the absence of a permanent physician in order to receive Claim B payments.

CMS’ guidance includes:

A patient’s regular physician may submit the claim and receive Medicare Part B payment for covered visit services (including emergency visits and related services) of a locum tenens physician who is not an employee of the regular physician, and whose services for patients of the regular physician are not restricted to the regular physician’s offices.

This is allowed if:

- The regular physician is unavailable to provide the visit services;
- The Medicare beneficiary has arranged or seeks to receive the visit services from the regular physician;
- The regular physician pays the locum tenens for his/her services on a per diem or similar fee-for-time-basis;
The substitute physician does not provide the visit services to Medicare patients over a continuous period of longer than 60 days (unless the regular physician has been called to active duty in the armed forces); and

The regular physician identifies the services as substitute physician services meeting the requirements of this section by entering HCPCS code modifier Q6 (services furnished by a locum tenens physician) after the procedure code. When Form CMS-1500 is next revised, provisions will be made to identify the substitute physician by entering his/her unique physician identification number (UPIN) or national provider identifier (NPI) when required to the carrier.

- If the only substitution services a physician performs in connection with an operation are post-operative services furnished during the period covered by the global fee, these services need not be identified on the claim as substitution services.
- The requirements for the submission of claims under reciprocal billing arrangements are the same for assigned and unassigned claims and should use the Q5 modifier (services furnished by a substitute physician under a reciprocal billing arrangement).

**Billing Requirements**

To operate within this guidance, Adams recommends the following:

- Medicare will complete credentialing within 60-90 days. This time period varies by state where as commercial payers credentialing timeframes vary depending on state rules. Locum tenens physicians do not need to enroll with the Medicare program to see patients; he/she should have a NPI and unrestricted license in the state in which he/she is working.

- The practice must maintain record of each service rendered by the locum tenens physician, with his or her NPI or UPIN. If you are using an EHR system there is no need to print claims information.
If the absent physician returns to the practice for a short period of time, this resets the 60-day clock. Practices are allowed to re-use the same locum tenens physician for subsequent absences.

Regular physicians can use more than one locum tenens physician to substitute their absence during a 60-day period. The use of each locum tenens physician cannot exceed the 60-continuous calendar day period. The substitute physician(s) cannot render services for the regular physician on the same day. An exception to the 60-day continuous rule is for regular physicians who are called to active duty in the armed forces. This time is unlimited.

There are three options for billing locum tenens coverage when the regular physician is on leave for more than 60 days:

1. Use a new locum after the first 60-day period has expired.

2. Begin the Medicare enrollment process at the beginning of the assignment. Then, bill the services provided beyond the initial 60 days using the locum tenens physician’s NPI number.

3. Have the absent physician return to the practice for a short period of time to reset the 60-day clock. Then you can re-use the same locum tenens physician.

Completing the Claim Form

As illustrated below, Medicare requires claims for services provided by a locum tenens physician to include the Q6 modifier, which designates services were performed by a locum tenens physician in box 24D of the CMS-1500 form. The regular physician’s provider identification number goes in box 24J.

Claims must contain the modifier ‘Q6’ after the procedure code in box 24D of the CMS-1500 form.
The following chart shows different scenarios you might encounter, and provides general guidance on whether or not billing for locum tenens services is allowed. As always, please review your contracts and speak with your payer representatives or Medicare contractor for their specific guidelines.

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<tbody>
<tr>
<td>Physician on leave for less than 60 days</td>
<td>Yes</td>
<td>Varies by state</td>
<td>No, provider should be credentialed and enrolled</td>
<td>Locum should be Tricare certified and should have TIN number</td>
</tr>
<tr>
<td>Physician on leave for more than 60 days</td>
<td>Should use new locum tenens physician after 60 days and bill under locum tenens physician’s NPI</td>
<td>Should use new locum tenens physician after 60 days and bill under locum tenens physician’s NPI</td>
<td>Varies by payer</td>
<td>Yes</td>
</tr>
<tr>
<td>Using the same locum tenens physician to cover multiple absences by the same doctor</td>
<td>Yes</td>
<td>Payers may have guidelines to use the same locum tenens physician again</td>
<td>Payers may have guidelines to use same locum tenens physician again</td>
<td>Yes</td>
</tr>
<tr>
<td>Replacing a physician no longer with the practice</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Need to expand practice coverage/seeking new doctor/expanding a service line</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Using locum tenens physician to cover a temporary patient volume increase</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Using advanced practice professionals on a locum tenens basis</td>
<td>No. Provisions apply for MD/DO only</td>
<td>No. Provisions apply for MD/DO only</td>
<td>No. Provisions apply for MD/DO only</td>
<td>Submit the Non-network PA individual application</td>
</tr>
<tr>
<td>Replacing a physician on leave less than 60 days with doctor via telemedicine</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

**Takeaways for Locum Tenens Billing**

Billing for services provided by a locum tenens physician doesn’t have to be difficult.

- Enroll providers in payer contracts and Medicare on the first day on the job, or prior to the first day if possible
• Keep detailed records of all services and claims and dates associated where Q-6 modifiers were used for locum tenens services in case of future payer audits. These are automatically stored in your electronic health records system if you are using one.

• Check your individual payer contracts for any specific guidelines about locum tenens billing. If no language is available, contact your representative to discuss.

About M-Scribe Technologies

Established in 2002 by a group of physicians, M-Scribe is a national provider of medical billing, coding and documentation services. M-Scribe consists of a team of over 500 healthcare professionals who work with more than 200 clinics and 25 hospitals nationwide. To learn more, visit www.m-scribe.com.

About LocumTenens.com

LocumTenens.com is a full-service staffing firm serving physicians, CRNAs, NPs and PAs searching for locum tenens and permanent job opportunities, as well as healthcare facilities looking to solve employment shortages. The operator of the largest internet job board for the locum tenens industry, LocumTenens.com provides job-seeking providers direct access to thousands of jobs, in all specialties, posted directly by facilities and agencies nationwide.