

Q&A: Observation Pro Fees 99222 & 99238

Question: An edit is preventing us from reporting professional codes for initial observation professional code with the discharge code. How should this be reported?

Answer: As noted, CCI Edits prevent reporting Pro Fee Codes 99222 (Initial Hospital Inpatient or Observation Care, per day) with the 99238 (Hospital Inpatient or Observation Discharge Day Management).

Report Selection CCI Edits Physician (v29.0, Jan-Mar2023) ✕			
CCI Edits Physician (V29.0, JAN-MAR2023)			
Codes and/or Descriptions: 99222,99238			
		Export to PDF Export to Excel Copy to Clipboard Subscribe to Updates	
Column 1	Column 2	Edit Type	GB Modifier Indicator
99222 - INITIAL HOSPITAL INPATIENT OR OBSERVATION CARE, PER DAY, FOR THE EVALUATION AND MANAGEMENT OF A PATIENT, WHICH REQUIRES A MEDICALLY APPROPRIATE HISTORY AND/OR EXAMINATION AND MODERATE LEVEL OF MEDICAL DECISION MAKING. WHEN USING TOTAL TIME ON THE DATE OF THE ENCOUNTER FOR CODE SELECTION, 55 MINUTES MUST BE MET OR EXCEEDED. (Column 1)	99238 - HOSPITAL INPATIENT OR OBSERVATION DISCHARGE DAY MANAGEMENT; 30 MINUTES OR LESS ON THE DATE OF THE ENCOUNTER (Column 2)	Column 1/Column 2 Correct Coding	0 - Code Pair cannot be billed

In their presentation [Advancing Landmark Revisions Across More Settings of Care](#), the AMA instructs providers to select an evaluation and management code from the following CPT® code set to report when a patient was admitted and discharged on the same date of service and the practitioner had two or more separate encounters (an initial and a discharge):

Report Selection 2023 Hospital Based HCPCS/CPT® Codes Quarter: Q1 ✕			
2023 HCPCS Codes - ALL Quarter: Q1			
Codes and/or Descriptions: 99234,99235,99236 for selected Provider: JEFFERSON COUNTY HOSPITAL (161364)			
Results returned(below): 3			
AWI: 1, DME: IA, Clinical Lab Fee Schedule: IA, Physician Fee Schedule:IA STATEWIDE			
Current Descriptor	Fee Schedule		Initial APC
<input type="checkbox"/> 99234 - hospital inpatient or observation care, for the evaluation and management of a patient including admission and discharge on the same date, which requires a medically appropriate history and/or examination and straightforward or low level of medical decision making. when using total time on the date of the encounter for code selection, 45 minutes must be met or exceeded. B - Non-allowed item or service for OPPS	GB (Physician Facility):	\$93.28	
	GB (Physician Non-Facility):	\$93.28	
<input type="checkbox"/> 99235 - hospital inpatient or observation care, for the evaluation and management of a patient including admission and discharge on the same date, which requires a medically appropriate history and/or examination and moderate level of medical decision making. when using total time on the date of the encounter for code selection, 70 minutes must be met or exceeded. B - Non-allowed item or service for OPPS	GB (Physician Facility):	\$151.47	
	GB (Physician Non-Facility):	\$151.47	
<input type="checkbox"/> 99236 - hospital inpatient or observation care, for the evaluation and management of a patient including admission and discharge on the same date, which requires a medically appropriate history and/or examination and high level of medical decision making. when using total time on the date of the encounter for code selection, 85 minutes must be met or exceeded. B - Non-allowed item or service for OPPS	GB (Physician Facility):	\$198.61	
	GB (Physician Non-Facility):	\$198.61	

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If there was only one practitioner encounter for the admission and the discharge and the patient's stay was less than 8 hours, one of the following codes should be reported:

Report Selection 2023 Hospital Based HCPCS/CPT® Codes Quarter: Q1 ✕			
2023 HCPCS Codes - ALL Quarter: Q1			
Codes and/or Descriptions: 99221,99222,99223 for selected Provider: JEFFERSON COUNTY HOSPITAL (161364)			
Results returned(below): 3			
AWI: 1 , DME: IA , Clinical Lab Fee Schedule: IA , Physician Fee Schedule: IA STATEWIDE			
Current Descriptor	Fee Schedule		Initial APC
<input type="checkbox"/> 99221 - initial hospital inpatient or observation care, per day, for the evaluation and management of a patient, which requires a medically appropriate history and/or examination and straightforward or low level medical decision making. when using total time on the date of the encounter for code selection, 40 minutes must be met or exceeded. B - Non-allowed item or service for OPPS	GB (Physician Facility): \$77.97 GB (Physician Non-Facility): \$77.97		
<input type="checkbox"/> 99222 - initial hospital inpatient or observation care, per day, for the evaluation and management of a patient, which requires a medically appropriate history and/or examination and moderate level of medical decision making. when using total time on the date of the encounter for code selection, 55 minutes must be met or exceeded. B - Non-allowed item or service for OPPS	GB (Physician Facility): \$123.16 GB (Physician Non-Facility): \$123.16		
<input type="checkbox"/> 99223 - initial hospital inpatient or observation care, per day, for the evaluation and management of a patient, which requires a medically appropriate history and/or examination and high level of medical decision making. when using total time on the date of the encounter for code selection, 75 minutes must be met or exceeded. B - Non-allowed item or service for OPPS	GB (Physician Facility): \$164.74 GB (Physician Non-Facility): \$164.74		

If there was only one practitioner encounter for the admission and the discharge and the patient's stay was 8 or more hours (even if it spanned two dates), one of the following codes should be reported:

2023 HCPCS Codes - ALL Quarter: Q1			
Codes and/or Descriptions: 99234,99236,99238 for selected Provider: DEMODEV (990001)			
Results returned(below): 3			
AWI: 1 , DME: CA , Clinical Lab Fee Schedule: CA2 , Physician Fee Schedule: LOS ANGELES-LONG BEACH-ANAHEIM (ORANGE)			
Current Descriptor	Fee Schedule		Initial APC
<input type="checkbox"/> 99234 - hospital inpatient or observation care, for the evaluation and management of a patient including admission and discharge on the same date, which requires a medically appropriate history and/or examination and straightforward or low level of medical decision making. when using total time on the date of the encounter for code selection, 45 minutes must be met or exceeded. B - Non-allowed item or service for OPPS	GB (Physician Facility): \$104.96 GB (Physician Non-Facility): \$104.96		
<input type="checkbox"/> 99236 - hospital inpatient or observation care, for the evaluation and management of a patient including admission and discharge on the same date, which requires a medically appropriate history and/or examination and high level of medical decision making. when using total time on the date of the encounter for code selection, 85 minutes must be met or exceeded. B - Non-allowed item or service for OPPS	GB (Physician Facility): \$222.68 GB (Physician Non-Facility): \$222.68		
<input type="checkbox"/> 99238 - hospital inpatient or observation discharge day management; 30 minutes or less on the date of the encounter B - Non-allowed item or service for OPPS	GB (Physician Facility): \$87.14 GB (Physician Non-Facility): \$87.14		

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