



SAINT LOUIS UNIVERSITY
COMPLIANCE
877-525-KNOW



February, 2015

MEDICAL BILLING AND CODING: *Mutually Exclusive Procedures*

As with tossing a single coin, there are certain procedure codes that are mutually exclusive of one another. A coin-tosser can only arrive at a HEAD or a TAIL, but never both. And a medical provider can only perform and bill for one mutually exclusive procedure, but not both. Mutually exclusive codes are those codes that cannot reasonably be accomplished within the same session.

An example of a mutually exclusive procedure is the repair of an organ by one of two different methods. Billing guidelines stipulate that only one mutually exclusive repair method can be charged. Another example is the billing of an "initial" service alongside a "subsequent" service. It is contradictory for a service to be classified as both "initial" and "subsequent" at the very same time, therefore they are mutually exclusive procedures. These procedure codes can be identified as "code pairs".

CPT codes can be deemed mutually exclusive based either upon their CPT definition or upon the medical impossibility/improbability that the procedures can be performed during the same session. These code pairs are not necessarily linked together by the code narrative, but are linked by the relationship they have. For example, a comprehensive procedure code compared to the individual component codes; these codes can be identified as code pairs and should not be billed together. The comprehensive code should be billed which covers all components of the procedure.

What about the case of using mutually exclusive codes recorded at different times during the same day, or on a different digit or limb? Mutually exclusive codes may be reported together when appropriately furnished and documented. It is appropriate to report these services using a HCPC code modifier. Applications of these modifiers prevent erroneous denials of claims for several procedures performed on different anatomical sites, on different sides of the body, or at different sessions on the same date of service. The medical record must support that the modifier is being used appropriately to describe separate services.

<http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals>

<http://www.cms.gov/Medicare/Coding/NationalCorrectCodnitEd/index.html?redirect=/nationalcorrectcodinited/>



HIPAA Awareness & Information Security Awareness Training

All workforce members who have access to patient information are required to complete these **mandatory** online education sessions.

If these trainings still appear on the "Compliance Requirements" section of your mySLU homepage you are considered delinquent.

Instructions for accessing and completing the course are available on the Compliance website [click here](#). (Note: The video playback speed can be adjusted at the bottom of the Tegrity player.)

All department Chairs will be notified of faculty and staff who have not completed this requirement.

*****Use Google Chrome to access the courses*****

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**TOLL FREE HOTLINE
877-525-KNOW**

What are the hotline hours? 24/7

Who answers the call? All calls are answered by a trained interview specialist who is not directly affiliated with Saint Louis University.

Can I remain anonymous? Yes. You have the option to give your name or report anonymously.

Will my call to the Compliance Hotline be recorded?

No call tracing or recording devices are used during the phone call. Your call will be answered by a specialist who will submit a report to the SLU Compliance Department.

Will I be penalized for using the Hotline?

Saint Louis University has policies that protect employees, agents, and contractors from discrimination and retaliation for filing a report to the Hotline.

For more information regarding the Hotline, visit The Compliance Website.

Export Controls

To protect our national security and promote foreign policy objectives, the federal government restricts the export and transmission of technology, software, and information to foreign persons, countries or entities. Export Control regulations do not just restrict the direct shipment of items to a foreign destination, they regulate the hand carrying of items (laptops, cellphones, flash drives) to foreign destinations, and discussing controlled information with foreign nationals in the U.S. or abroad (“deemed export”).

What steps does SLU take?

- Research proposals and Clinical Trials are reviewed by the University Export Control Officer to determine if the project will need a Technology Control Plan.
- All international travel is reviewed by the Export Control Officer to verify that the location of travel and items taken adhere to federal regulations.
- Foreign visitors and entities that conduct business with SLU are screened to verify that SLU is complying with all government sanctions.

Penalties:

The punishments for violating Export Control regulations are severe for both the individual and the University.

- ITAR violations: Up to 2 years in prison and/or \$100,000 fine per violation.
- EAR violations: fines up to \$1,000,000 or five times the value of the exports, whichever is greater; or for an individual, imprisonment of up to 10 years and/or a fine of up to \$250,000 per violation.

If you have any further questions regarding Export Controls, please contact Michael Reeves, Export Control Officer, at 977-5880 or mreeves8@slu.edu.