



What's New for RCM? Updates on Coding for COVID-19 Testing

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As lab testing for COVID-19 continues to evolve, new products—and new CPT codes—continue to emerge. The latest tests combine COVID-19 testing with a test for influenza A and B. There are two types: one includes the polymerase chain reaction (PCR) test, the other includes the antigen test. The new CPT codes are:

- **87636:** Infectious agent detection by nucleic acid (DNA or RNA); severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) (Coronavirus disease [COVID-19]) and influenza virus types A and B, multiplex amplified probe technique

This CPT is effective as of October 6, 2020. The *CPT Assistant* article can be found at <https://www.ama-assn.org/system/files/2020-10/cpt-assistant-guide-coronavirus-october-2020.pdf>.

- **87428:** Infectious agent antigen detection by immunoassay technique, (eg, enzyme immunoassay [EIA], enzyme-linked immunosorbent assay [ELISA], fluorescence immunoassay [FIA], immunochemiluminometric assay [IMCA]) qualitative or semiquantitative; severe acute respiratory syndrome coronavirus (eg, SARS-CoV, SARS-CoV-2 [COVID-19]) and influenza virus types A and B

CPT 87428 is effective as of November 10, 2020. This *CPT Assistant* article can be found at <https://www.ama-assn.org/system/files/2020-11/cpt-assistant-guide-coronavirus-november-2020.pdf>.

The new cobas SARS-CoV-2 & Influenza A/B Nucleic Acid Test for use on the cobas Liat System that is manufactured by Roche Molecular Systems, Inc. is reported with CPT 87636. Quidel Corporation has a test, Sofia 2 Flu + SARS Antigen FIA, that is reported with CPT 87428.

See **Table 1** for a CPT/lab test crosswalk. All the tests listed have a waived status, which means they can be billed by



clinics with a CLIA Certificate of Waiver. Modifier QW should be appended when the insurance plan requires it.

While these new CPT codes are needed in a timely fashion, they present unique problems for payers and the RCM team. These are payable codes by insurance plans, but payers are looking to Medicare to set a fee at the national level. Instead, CMS has made them contractor-priced until they undergo the Clinical Laboratory Fee Schedule annual payment determination process, meaning each Medicare carrier will set their own price and other payers are left trying to make their own determination on what to pay.

Take code 87426 for antigen testing as an example. Here is a summary of what we're seeing at Experity for reimbursement:

- Overall average reimbursement is in the high \$30s or low \$40s.
- Reimbursement is inconsistent, with some payers as low as \$9 (well below the cost of the test).
- The cost for most clients is in the low-to-mid \$20s, so profit is going to be driven by payer mix considering the variability in payer pricing.
- The HRSA Uninsured Portal is holding claims with CPT 87426 until a national allowable is set by CMS. It will be covered though payment is delayed.

Due to this confusion, practices are wondering if they can just have patients pay for the test instead of billing their insurance. The short answer is *no*. Providers under contractual



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Table 1. CPT/Lab Test Crosswalk

Test	Manufacturer	CPT
Assure COVID-19 IgG/IgM Rapid Test Device	Assure Tech (Hangzhou Co., Ltd)	86328
CareStart COVID-19 Antigen test	Access Bio, Inc.	87426
BinaxNOW COVID-19 Ag Card	Abbott Diagnostics Scarborough, Inc.	87426
LumiraDx SARS-CoV-2 Ag Test	LumiraDX UK Ltd.	87426
BD Veritor System for Rapid Detection of SARS-CoV-2	Becton, Dickinson and Company (BD)	87426
Sofia 2 SARS Antigen FIA	Quidel Corporation	87426
Cue COVID-19 Test	Cue Health Inc.	87635
ID NOW COVID-19	Abbott Diagnostics Scarborough, Inc.	87635
Xpert Xpress SARS-CoV-2 test	Cepheid	87635
Accula SARS-Cov-2 Test	Mes Biotech Inc.	87635
cobas SARS-CoV-2 & Influenza A/B Nucleic Acid Test for use on the cobas Liat System	Roche Molecular Systems, Inc.	87636
BioFire Respiratory Panel 2.1-EZ (RP2.1-EZ)	BioFire Diagnostics, LLC	0202U
Xpert Xpress SARS-CoV-2/Flu/RSV	Cepheid	0241U
Sofia 2 Flu + SARS Antigen FIA	Quidel Corporation	87428

agreement with a payer to provide covered services are contractually obligated to bill insurance for those services and to only collect allowable patient portions based on the individual member benefit. Example:

4.5.2 Timeliness of Claim Submission. You agree not to bill, charge, seek compensation or remuneration or reimbursement, or collect from the Member or us any amount for services or supplies provided to a Member for which a claim was not submitted to us in accordance with Section 4.2.2.

Additionally, payers paying off case rates/global rates/flat rates consider COVID testing to be not billable outside of the case rate. If COVID testing is done in the office as part of the office visit, the payer considers the case/global/flat rate as payment in full. Payers consider it a violation of the agreement if a provider charges the patient separately in this case. However, sending the patient out for testing is acceptable.

Experity is actively monitoring this situation.

Vaccines

In anticipation of a vaccine for COVID-19, the American Medical Association has worked with the Food and Drug Administration, Centers for Disease Control and Prevention, and the Centers for Medicare & Medicaid Services to create a new code set for these services. The plan is to use these for both billing and tracking. They can be found in a new Appendix Q, which will be updated as new vaccines become available (<https://www.ama-assn.org/system/files/2020-11/covid-19-immunizations-appendix-q-table.pdf>).



The structure is different from other vaccines. Each unique vaccine will have its own administration codes(s), depending on the number of doses. The manufacturer and name will be specifically listed in CPT, along with the NDC.

For example, Pfizer’s vaccine will be reported as follows:

First dose:	Second dose:
Vaccine: 91300	Vaccine: 91300
Admin: 0001A	Admin: 0002A
NDC: 59267-1000-01	NDC: 59267-1000-01
ICD: Z23	ICD: Z23

Those administration codes can only be used with CPT 91300 for the Pfizer product.

This Appendix Q will expand as new vaccines become available. If you change products, you need to change codes.

There is a lot we don’t know from an RCM perspective on what clinics will bill and to whom. Experity continues to monitor and will provide information as it becomes available.

Looking forward to a healthy and social 2021! ■