

# BWC Policy Alert

## 2018 BWC Policy Clarification

### Policy Clarification on Pass-Through Billing

Date: April 5, 2018

Policy Alert # 2018-1

#### Purpose

This BWC policy alert clarifies BWC's policy on pass-through billing.

#### Issue

BWC has identified cases where providers are submitting bills for services, which other providers performed, also known as pass-through billing.

#### Discussion

Pass-through billing occurs when the ordering physician, professional provider, facility or ancillary provider requests and bills for a service. However, the ordering physician, professional provider, facility or ancillary provider does not perform the service.

Per Ohio Administrative Code 4123-6-02 (B) and BWC's *Provider Billing and Reimbursement Manual*, a provider who meets BWC's enrollment qualifications must enroll to receive an individual provider number. The provider must submit the individual provider number as the servicing provider number for billing purposes. BWC requires the performing physician, professional provider, facility or ancillary provider to bill only for the services they render. This rule and policy are applicable unless otherwise excepted by BWC.

BWC will not reimburse for pass-through billing except in the following circumstances noted below and detailed in the *BWC Provider Billing and Reimbursement Manual*:

- Physical therapists, occupational therapists, speech pathologists, licensed athletic trainers and massage therapists employed by therapy groups, home health agencies, skilled nursing facilities or hospitals;
- Hospice providers with contracts with nursing homes or hospitals for certain services;
- Services provided as part of an all-inclusive per diem rate (e.g. nursing home, detoxification, etc.).

In addition, this policy alert serves to clarify that BWC does not require the individual treating provider to bill for services performed as part of the facility portion of a hospital inpatient admission or hospital outpatient encounter. This policy is applicable even if the provider is eligible to enroll with BWC (e.g., licensed social workers).

#### Pass-through billing example

The physician collects a urine specimen at his office for a drug test and forwards the specimen to CLIA-certified lab. The lab performs the drug test and reports the results to the ordering physician. The ordering physician reports his individual servicing provider number on the bill for the lab test. BWC would deny this bill as the ordering physician did not perform the service. In this case, the CLIA-certified lab that performed the test must bill for the drug test.

#### Conclusion

Effective for dates of service on or after April 1, 2018, BWC requires the performing physician, professional provider, facility or ancillary provider to bill for the services they render unless otherwise excepted by BWC. The performing physician, professional provider, facility or ancillary provider shall report the servicing provider number on the bill.