The American Academy of Neurology (AAN) is an association of more than 28,000 neurologists and clinical neuroscience professionals dedicated to providing the best possible care for patients with neurological disorders. AAN strives to be the best source of accurate information for neurologists in order to promote high quality, safe, and cost-effective care.

Background

In August of 2012, the AAN issued a Position Statement on Definition of Neurology Subspecialty. The purpose of the Position Statement was to inform members regarding 2012 revisions by the Centers for Medicare and Medicaid Services (CMS) of the “Three Year Rule” which prevents a physician from claiming as a new patient someone who has been seen by a provider of the same subspecialty in the same group practice within the previous three years. In the Position Statement, AAN listed neurology subspecialties recognized by the medical community in order to assist its members in determining if a new patient encounter may be reported. The list included UCNS subspecialties, among others.

The Issue

Some UCNS diplomates have encountered difficulties receiving reimbursement for “new patient” visits because their subspecialties are not listed in the Medicare Physician Specialty Codes. In addition, electronic health records (EHR) systems used by some hospitals only recognize CMS physician codes or subspecialties in the National Uniform Claim Committee (NUCC) Health Care Provider Taxonomy code set, thereby making it difficult for UCNS diplomates to be compensated appropriately for their subspecialty services. Private insurers may refer to the CMS and NUCC lists in making reimbursement decisions.

How AAN Can Help

Obtaining a taxonomy code may be a prerequisite for inclusion in the Medicare Physician Specialty Codes list. It may also help in obtaining recognition by private insurers and inclusion in EHR systems. The AAN is prepared to coordinate an initiative to submit petitions to NUCC on behalf of neurologic subspecialties that might qualify for inclusion in the Health Care Provider Taxonomy code set.

Factors to Consider before Requesting AAN’s Assistance

Below are factors the NUCC considers in evaluating code requests:

Overall
- Request meets a national need and not a state or local need
- Exception – Provider is recognized in one or few states, but needs to obtain an NPI
- Request meets a need not currently uniquely identified in the code set
Requirement: Only one (1) of the following needs to be met.

Provider Specialty is used to do the following:
- Categorize providers in a provider directory
- Apply for an NPI for a health care provider (as defined by HIPAA)
- Identify a provider in electronic transaction(s)
- Identify a provider for reimbursement purposes
- Identify provider practice focus and/or education/training for provider enrollment in health plans
- Identify course area of specialization of education/training at accredited post-secondary educational institutions
- Identify course area of specialization of continuing education offered by established CEU program sponsors
- Identify providers in local, regional or national health information exchange
- Identify providers in public health-related data transactions

If you are unable to select any criterion from the previous list, but still believe that you qualify for a taxonomy code, it is acceptable to fill out the request form.

Meeting one or more of the following provides additional business justification of the need for a unique code:
- American Board of Medical Specialties (ABMS) and/or American Osteopathic Association certification exists
- Accreditation Counsel for Graduate Medical Education (ACGME) – accredited residency or subspecialty training program
- Existence of a nationally recognized specialty board, or a specialty defined by a subspecialty certification or a certificate of special competence issued by such a board or a nationally recognized accrediting body, or recognized by a regulatory agency
- Demand for services is such that a significant number of providers choose to limit their practice to that specialty
- The specialty is based on major new concepts in health science having broad professional support
- The specialty is a distinct and well-defined new field of health care that entails special concern with the problems of a specific patient group, organ system, disease entity, or health care procedure

In addition, NUCC likely will consider whether the subspecialty has substantial numbers of accredited fellowships and diplomates.

Finally, the subspecialty should evaluate the likely advantages and disadvantages of inclusion on the NUCC list.

Submitting the Request for Assistance

If, after considering the above factors, the subspecialty would like the AAN to submit a request to NUCC on its behalf, the sponsoring organization(s) of the subspecialty should submit a letter to AAN outlining why the subspecialty qualifies for a taxonomy code. The letter should address each of the above criteria, even if one or more criteria is (are) unmet. It should include sufficient background information and data to support the subspecialty’s conclusion that NUCC recognition is warranted. The letter should be addressed to the President of AAN.

Action by AAN

AAN will make the final determination regarding what is in the best interests of neurology. In doing so, it may take into consideration factors such as timing and the likelihood of success for each request. AAN will consult closely with UCNS and professional consultants. AAN reserves the right not to submit an application. In each case, the results will be reviewed looking toward next steps, including an effort to seek recognition by CMS in the future. AAN will offer its assistance to ABPN subspecialties in addition to UCNS subspecialties.