E/M Workgroup Webinar: Navigating the Revised CPT[®] Codes for Office and Outpatient E/M Services

Ronald Devine, MD, FACP, FIDSA Prashant Malhotra, MD, FACP, FIDSA





Billing and Coding Evaluation and Management CPT[®] Changes for 2021

Ronald Devine, MD, FACP, FIDSA

Atlanta ID Group

Atlanta, GA

Office or Other Outpatient E/M visits CPT® (99202-99215) Changes 2021



Only applies to codes 99202-99215



Does NOT affect outpatient consultation codes



Does NOT affect inpatient/ hospital visit codes





When did these changes take effect?

JANUARY 1, 2021

Office or Other Outpatient E/M visits CPT® (99202-99215) Changes 2021

- What changes?
 - Removes history and physical examination as key components
 - Based on medical decision making (MDM)
 - MDM criteria changes
 - MDM is same between new and established visit levels (ie, 99204 and 99214 have same MDM)

or

- Based on total time
 - Time intervals for visits are changed
- CPT[®] code 99201 is deleted
- New prolonged services code





Medical Decision Making (MDM)

- Three elements
 - Number and complexity of problems addressed at encounter
 - Amount and/ or complexity of data reviewed/ analyzed
 - Risk of complications, morbidity, and/ or mortality of patient management decisions

Medical Decision Making (MDM)

• Types

- Straightforward
- Low
- Moderate
- High





| CPT® Code | Level of MDM* | Number and Complexity of Problems Addressed | Amount and/ or Complexity of Data Reviewed/ Analyzed** | Risk of Complications and/or Morbidity or Mortality of Patient Management |
|--------------|---------------|---|---|--|
| 99211 | N/A | N/A | N/A | N/A |
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*Based on 2 out of 3 elements of MDM (number and complexity of problems addressed, amount and/ or complexity of data reviewed/ analyzed, risk of complications and/ or morbidity or mortality of patient management) **Each unique test, order, or document contributes to the combination of 2 or combination of 3 in Category 1





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|----------------|---------------|---|---|--|
| 99202 99212 | and/ or co | | Minimal or none of MDM (number and complexity of prok iewed/ analyzed, risk of complications an ent) | |
| | | et or exceed 2 out of 3 | 3 elements of MDM | |

Each unique test, order, or document contributes to the combination of 2 or combination of 3 in Category 1 *Table adapted from American Medical Association CPT® Professional 2021





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| 99202 99212 | Straightforward | Minimal • 1 self-limited or minor problem | Minimal or none | Minimal risk of morbidity from additional diagnostic testing or treatment |
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| 99202 99212 | | | Minimal or none Minimal risk of morbidity from additional diagnostic testing or treatment diagnostic testing or treatment dition, illness, injury, symptom, sign, finding, complaint, or ne encounter, with or without a diagnosis being established at | | | |
| | the tin | ne of the encounter." | -American Medical Association C | PT [®] Professional 2021 | | |

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|----------------|---|---|--|--|
| 99202 99212 | A pr heal A pr with care Refe | Ith care professional (C oblem is not considerent nout further document e coordination | Minimal or none ed or treated at the encounter by the phy QHCP) ed addressed or managed if another pro cation that reporting provider is doing ac n or consideration of treatment is not co | vider is managing dditional assessment or |
| | | | | |

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| | Probability | and/ or consequence | s of an event | | | | | |
| | · · · · · · | nature of considered | | | | | | |
| | | Low probability of death is high risk | | | | | | |
| | High cl | hance of minor, <u>self-li</u> | mited adverse effect of treatment is low | risk | | | | |

- Based on usual behavior and thought processes of physician or other QHCP in same specialty
- Based on consequences of the problem(s) addressed when appropriately treated
- Includes medical decision making with regards to initiate or forego further testing, treatment, and/ or hospitalization

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| | mplexity of Problems dressed | Analyzed** | Complexity of Data Reviewed/ | Risk of Complications and/or Morbidity or Mortality of Patient Management |
|-------|---|--|--|--|
| Uniqu | 2 or more self-limited or minor problems; or ue Test by a single CPT dated (Hgb, Hct, RBC d differential WBC co d, aerobic, with isola solates (includes and | 2 categories) , WBC and bunt tion and | quirements of at least 1 of the and documents on of 2 from the following: of prior external note(s) from hique source**; of the result(s) of each unique ng of each unique test** ment requiring an independent | Low risk of morbidity from additional diagnostic testing or treatment |

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| spou Prov prov prov neec | ise, witness) ides history in a ided by patient ide complete or | nt, guardian, surrogat ddition to history who is unable to reliable history or history as judged to b | | |

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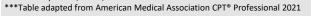
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| ind into Cat to o Cat | Moderate sessment requiri lependent histor o Category 1 tegory 1 require combination of 3 tegory 2 with ne tegory 3 added | rian(s) moves ment increases 3 | Moderate (Must meet the requirements of at least 1 out of 3 categories) Category 1: Tests, documents, or independent historian(s) Any combination of 3 from the following: Review of prior external note(s) from each unique source** Review of the result(s) of each unique test** Ordering of each unique test** Assessment requiring an independent historian(s) Or Category 2: Independent interpretation of tests Independent interpretation of a test performed by another physician/other qualified health care professional (not separately reported) Or Category 3: Discussion of management or test interpretation with external physician/other qualified health care professional / appropriate source (not separately reported) | Moderate risk of morbidity from additional diagnostic testing or treatment Examples only: Prescription drug management Decision regarding minor surgery with identified patient or procedure risk factors Decision regarding elective major surgery without identified patient or procedure risk factors Decision regarding hat end or procedure risk factors Diagnosis or treatment significantly limited by social determinants of health |

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| • | report or interpretation | e documented in char omplete report sian or QHCP has repo | which customarily has a f at least 1 out of f at least 1 out of r independent r independent interpretation of tests Independent interpretation of a test performed by another physician/other qualified health care professional (not separately reported) or Category 3: Discussion of management or test interpretation Discussion of management or test interpretation with external physician/other qualified health care professional/ appropriate source (not separately reported) | Moderate risk of morbidity from additional diagnostic testing or treatment Examples only: Prescription drug management Decision regarding minor surgery with identified patient or procedure risk factors Decision regarding elective major surgery without identified patient or procedure risk factors Diagnosis or treatment significantly limited by social determinants of health |
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| | | | by a provider not in same group practor Or Catego or Subspective Discussion of management or test interpretation with external physician/other qualified health care professional/ appropriate source (not separately reported) | |

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|----------------|------------------|---|--|--|
| 99205 99215 | High | High • 1 or more chronic illnesses with severe exacerbation, progression, or side effects of treatment; or • 1 acute or chronic illness or injury that poses a threat to life or bodily function | Extensive (Must meet the requirements of at least 2 out of 3 categories) Category 1: Tests, documents, or independent historian(s) Any combination of 3 from the following: Review of prior external note(s) from each unique source** Review of the result(s) of each unique test** Ordering of each unique test** Assessment requiring an independent historian(s) or Category 2: Independent interpretation of a test performed by another physician/other qualified health care professional (not separately reported) or Category 3: Discussion of management or test interpretation Discussion of management or test interpretation with external physician/other qualified health care professional (not separately reported) | High risk of morbidity from additional diagnostic testing or treatment Examples only: Drug therapy requiring intensive monitoring for toxicity Decision regarding elective major surgery with identified patient or procedure risk factors Decision regarding emergency major surgery Decision regarding hospitalization Decision not to resuscitate or to deescalate care because of poor prognosis |

*Based on 2 out of 3 elements of MDM (number and complexity of problems addressed, amount and/ or complexity of data reviewed/ analyzed, risk of complications and/ or morbidity or mortality of patient management)

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| CPT® Code | Level of MDM* | Number and Complexity of Problems Addressed | Amount and/ or Complexity of Data Reviewed/ Analyzed** | Risk of Complications and/or Morbidity or Mortality of Patient Management |
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Multiple problems with lower severity may be higher risk due to interaction

Need to document this interaction





Changes from requirement that counseling and/ or coordination of care dominates the visit to **TOTAL TIME**

Counseling and/ or coordination of care does NOT need to dominate the visit

Still requires a face-to-face encounter

Not used for 99211



Time



Office or Other Outpatient E/M visits CPT[®] (99202-99215)

Previous Times (2020)

New Times (2021)

| E/M Level | Time (minutes) | E/M Level | Time (minutes) |
|-----------|----------------|-----------|----------------|
| 99202 | 20 | 99202 | 15-29 |
| 99203 | 30 | 99203 | 30-44 |
| 99204 | 45 | 99204 | 45-59 |
| 99205 | 60 | 99205 | 60-74 |
| 99211 | 5 | 99211 | NA |
| 99212 | 10 | 99212 | 10-19 |
| 99213 | 15 | 99213 | 20-29 |
| 99214 | 25 | 99214 | 30-39 |
| 99215 | 40 | 99215 | 40-54 |





Office or Other Outpatient E/M visits CPT® (99202-99215)

- Time
 - Total time on the date of the encounter
 - Includes:
 - Face-to-face time by physician or other qualified health care provider (QHCP)
 - Non-face-to-face time by physician or other QHCP
 - Does not include:
 - Time spent with normal activities by clinical staff
 - Time spent on date other than the date of the encounter







- Time
 - Activities include:
 - Preparing to see patient (eg, review of tests, medical records)
 - Obtaining history
 - Performing medically appropriate physical examination
 - Counseling and education of patient, family member, or caregiver
 - Ordering medications, tests, or procedures
 - Referring and communicating to other health care professionals (when not separately reported)
 - Documentation
 - Independent interpretation of results (when not separately reported)
 - Care coordination (when not separately reported)





Office or Other Outpatient E/M visits CPT® (99202-99215)

- Time
 - Activities include:
 - Preparing to see patient (eg, review of tests, medical records)
 - Obtaining history
 - Performing medically appropriate physical examination
 - Counseling and education of patient, family member, or caregiver
 - Ordering medications, tests, or procedures
 - Referring and communicating to other health care professionals (when not separately reported)
 - **Documentation**
 - Independent interpretation of results (when not separately reported)
 - Care coordination (when not separately reported)





Office or Other Outpatient E/M visits CPT[®] (99202-99215)

• Time

- Total time should be documented correctly and not guessed or rounded
- Do not need to document time for each activity
 - Should document activities occurring during that time (reviewing medical records, reviewing labs/ tests, obtaining history, discussion of plan of care with patient)

Time

Shared or split visit

- Distinct time is summed for total time
 - Time spent separately by physician and other QHCP are summed
 - Time spent by physician and other QHCP doing same task is only counted for one provider



- CPT[®] 99417
 - Must meet highest E/M level by time (ie, 99205 or 99215)
 - Time must exceed 15 minutes beyond minimal time for the highest E/M level
 - 99205- Total time 60-74 minutes
 - 99215- Total time 40-54 minutes
 - Example- Total time spent 83 minutes with new patient
 - 99205 (74 minutes)
 - 99417 x1 (additional 9 minutes which is 23 minutes beyond minimum of 60 minutes)

Prolonged service time with or without direct patient contact on the date of Office or Other Outpatient E/M visits CPT[®] (99202-99215)





Prolonged service time with or without direct patient contact on the date of an office or other outpatient service CPT® (99202-99215)

| Use with 99205 (New Patient) | Code(s) reported |
|---|---|
| Less than 75 minutes | Use appropriate E/M code |
| 75-89 minutes | 99205 x1 <u>AND</u> 99417 x1 |
| 90-104 minutes | 99205 x1 <u>AND</u> 99417 x2 |
| 105 minutes or more | 99205 x1 <u>AND</u> 99417 x3 or more for each additional 15 minutes |
| Use with 99215 (Established Patient) | Code(s) reported |
| Less than 55 minutes | Use appropriate E/M code |
| 55-69 minutes | 99215 x1 <u>AND</u> 99417 x1 |
| 70-84 minutes | 99215 x1 <u>AND</u> 99417 x2 |
| | |





Prolonged service time with or without direct patient contact on the date of Office or Other Outpatient E/M visits CPT[®] (99202-99215)

HCPCS code G2212 (Medicare)



• Used for Medicare patients

 \bullet

- Used when the maximum time for level 5 (99205 or 99215) is exceeded by at least 15 minutes on date of encounter
- Further billed in 15 minute increments





Prolonged service time with or without direct patient contact on the date of an office or other outpatient service CPT® (99202-99215)

> HCPCS G2212 (Medicare)

| Use with 99205 (New Patient) | Code(s) reported |
|---------------------------------|---|
| 60-74 minutes | 99205 |
| 89-103 minutes | 99205 x1 <u>AND</u> G2212 x1 |
| 104-118 minutes | 99205 x1 <u>AND</u> G2212 x2 |
| 119 minutes or more | 99205 x1 <u>AND</u> G2212 x3 or more for each additional 15 minutes |

| Use with 99215 (Established Patient) | Code(s) reported |
|---|---|
| 40-54 minutes | 99215 |
| 69-83 minutes | 99215 x1 <u>AND</u> G2212 x1 |
| 84-98 minutes | 99215 x1 <u>AND</u> G2212 x2 |
| 99 minutes or more | 99215 x1 <u>AND</u> G2212 x3 or more for each additional 15 minutes |





Prolonged service time with or without direct patient contact on the date of an office or other outpatient service CPT® (99202-99215)

Do not use 99354/ 99355 (faceto-face prolonged time) or 99358/ 99359 (non-face-to-face time) on same date of encounter

Use 99417 or G2212





Differences Between Office or Other Outpatient Services and Other E/M Services

| Component(s) for E/M Code Selection | Office or Other Outpatient Services (99202-99215) | Other E/M Services (Consultations, Hospital Inpatient Visits) | | | |
|--|--|--|--|--|--|
| History | Documented as medically appropriate Not used in code selection | 1 of 3 key components of code selectionCriteria requirements | | | |
| Physical Examination | Documented as medically appropriate Not used in code selection | 1 of 3 key components of code selectionCriteria requirements | | | |
| Medical Decision Making (MDM) | Used for code selection New and established patients with same level use same MDM | 1 of 3 key components of code selection Criteria requirements | | | |
| Time | • Total time on date of encounter | Face-to-face time or time at bedside/ on floor or unit when counseling and/or coordination of care dominates the service | | | |
| Prolonged Time | New CPT[®] code 99417 or G2212 (Medicare) 15 minute increments For use on same day of encounter | 99354/ 99355- Outpatient 99356/ 99357- Inpatient 99358/ 99359- Non-face-to-face | | | |
| Table adapted from American Medical Association CPT [®] Professional 2021 | | | | | |





Summary

- Evaluation and Management (E/M) CPT[®] changes for 2021 affect Office or Other Outpatient E/M visits CPT[®] (99202-99215)
- Changes effective as of January 1, 2021
- Coding is based on medical decision making (MDM)
- History and physical examination have been removed as key components
- Medically necessary and relevant history and physical examination should be documented
- Time is an option for code selection and includes total time and time intervals have changed
- New prolonged time CPT[®] code 99417 or HCPCS code G2212 to be used with Office or Other Outpatient E/M visits CPT[®] codes (99202-99215) on same day of encounter





CPT coding changes: Clinical Vignettes PRASHANT MALHOTRA, MD, FACP, FIDSA

- ▶ 65 yr-old with CHF, DM, and HTN.
- Chief complaint: leg swelling and erythema; no fevers
 - No pain
- Exam: right lower leg with swelling, mild erythema but no tenderness
- Assessment: venous stasis and not cellulitis.
- Plan: advised patient to perform leg elevation and schedule follow-up visit with primary care physician (PCP) for possible adjustment of CHF medication.
- ► Follow-up as needed (PRN).







| CPT Code | MDM (2 of 3 elements needed) | Problems (number & complexity) | Data | Risk |
|-------------|---------------------------------------|--|---|--|
| 99202/99212 | Straightforward | 1 self-limited orMinor problem | Minimal | Minimal |
| 99203/99213 | Low | >2 self-limited/minor 1 stable chronic 1 acute uncomplicated | 1/2 of 2/3 of ordering test, review of results or prior external note Independent historian | Low |
| 99204/99214 | Moderate | >1 chronic problem with progression/exacerbation/adv erse effects OR >2 stable chronic OR 1 new problem/acute illness + systemic symptoms/acute complicated injury | 1/3 of (>3/4) order test or review test or records or independent history Independently review and interpret test/radiology Discuss management/plan with another provider | Moderate e.g. Prescriptions Minor or elective major surgery without risk factors |
| 99205/99215 | High | >1 chronic illness with severe progression/exacerbation/adv erse effects OR Illness with threat to life or body function | 2/3 of (>3/4)Order test or review test or records or independent history Independently review and interpret test/radiology Discuss management/plan with another provider | High e.g. Intensive drug toxicity monitoring Elective surgery with risk factor Emergency surgery Hospitalization Advance care directives |

| CPT Code | MDM (2 of 3 elements needed) | Problems (number & complexity) | Data | Risk |
|-------------|---------------------------------------|--|---------|---------|
| 99202/99212 | Straightforward | 1 self-limited or Minor problem | Minimal | Minimal |

- A definite and prescribed course
- Transient in nature
- Not likely to permanently alter health status





- ▶ 65 yr-old DM, CHF, and HTN
- Chief complaint: leg swelling and rash ×4 days with some pain
 - Feels feverish
 - Old records from prior PCP reviewed no MRSA
 - ► No allergies
- Exam: vital signs stable; no fevers
 - Right leg swelling with erythema, mild tenderness, no pustules
- Assessment: non-purulent RLE cellulitis
- Plan: oral Keflex ×5 days
- Follow-up next week











| CPT Code | MDM (2 of 3 elements needed) | Problems (number & complexity) | Data | Risk |
|-------------|------------------------------------|--|--|--|
| 99202/99212 | Straightforward | 1 self-limited orMinor problem | Minimal | Minimal |
| 99203/99213 | Low | >2 self-limited/minor 1 stable chronic 1 acute uncomplicated | 1/2 of 2/3 of ordering test, review of results or prior external note Independent historian | Low |
| 99204/99214 | Moderate | >1 chronic problem with progression/exacerbation/adv erse effects OR >2 stable chronic OR 1 new problem/acute illness + systemic symptoms/acute complicated injury | 1/3 of (>3/4) order test or review test or records or independent history Independently review and interpret test/radiology Discuss management /plan with another provider | Moderate e.g. Prescriptions Minor or elective major surgery without risk factors |
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|-------------|------------------------------------|---|---|------|
| 99203/99213 | Low | >2 self-limited/minor 1 stable chronic 1 acute uncomplicated | 1/2 of 2/3 of ordering test, review of results or prior external note Independent historian | Low |

- Duration >1 year or until death
- At Rx goal for condition
- Not stable if not at Rx goal even if unchanged
- Risk of morbidity significant if untreated





| CPT Code | MDM (2 of 3 elements needed) | Problems (number & complexity) | Data | Risk |
|-------------|------------------------------------|---|---|------|
| 99203/99213 | Low | >2 self-limited/minor 1 stable chronic 1 acute uncomplicated | 1/2 of 2/3 of ordering test, review of results or prior external note Independent historian | Low |

- Recent or new short-term problem
- Low risk of morbidity for considered treatment
- Little to no risk of mortality with treatment
- Expected full recovery without functional impairment
- Normally self-limited or minor problems that are not resolving





- 65 yr-old with h/o DM, CHF, HTN
- Chief complaint: leg swelling and rash ×4 days with some pain, fevers
- Old records from primary care physician has h/o MRSA

No allergies

- **Exam:** vital signs stable; T 102
 - Right leg swelling with erythema, mild tenderness, small pustule, minimal discharge
- Assessment: RLE purulent cellulitis, possibly MRSA
- Plan: CBC CMP and wound culture ordered
 - 5 days of oral doxycycline, adverse effects discussed
- Follow up next week; advised to contact earlier if worsens, case also discussed with PCP

Order tests + review old records Discussion with other provider

New problem +

systemic signs







| CPT Code | MDM (2 of 3 elements needed) | Problems (number & complexity) | Data | Risk |
|-------------|---------------------------------------|---|--|--|
| 99202/99212 | Straightforward | 1 self-limited orMinor problem | Minimal | Minimal |
| 99203/99213 | Low | >2 self-limited/minor 1 stable chronic 1 acute uncomplicated | 1/2 of 2/3 of ordering test, review of results or prior external note Independent historian | Low |
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- Chronic illness with acute worsening, poorly controlled, or progressing
- Intent to control progression
- Requires additional supportive care or attention to treatment for side effects
- Does not require consideration of hospital level of care





| CPT Code | MDM (2 of 3 elements needed) | Problems (number & complexity) | Data | Risk |
|-------------|---------------------------------------|--|--|---|
| 99204/99214 | Moderate | >1 chronic problem with progression/exacerbation/ad verse effects OR >2 stable chronic OR 1 new problem/acute illness + systemic symptoms/acute complicated injury | 1/3 of (>3/4) order test or review test or records or independent history Independently review and interpret test/radiology Discuss management /plan with another provider | Moderate e.g. Prescriptions Minor or elective major surgery without risk factors |

- Causes systemic symptoms
- High risk of morbidity without treatment
- Symptoms in a minor illness that are treated to alleviate symptoms, shorten illness course, or prevent complications should be treated as self-limited or minor or acute, uncomplicated
- Systemic symptoms may not be general and may be single system (ie, pyelonephritis, pneumonitis, colitis)





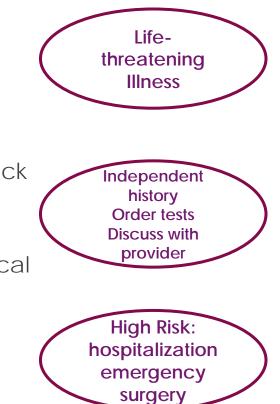
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- Complicated illness
- Includes evaluation of body systems not part of illness
- Includes more possible diagnoses





- ▶ 65 yr-old with DM, CHF, HTN
- Chief complaint: Leg swelling, pain ×4 days
 - Feels very sick; unable to provide history
 - Call Daughter :says mom has fevers, malaise and severe leg pain
- **Exam:** leg erythema with severe tenderness; appears sick
 - VS 90/60 118 18 103
- Assessment: RLE cellulitis, sepsis, ?necrotizing fasciitis
- Plan: Send to ER for hospitalization and emergent surgical evaluation
 - CBC CMP, blood cultures
 - IV Vancomycin and Piperacillin/tazobactam with Vancomycin level monitoring
 - Case discussed with ER and surgical attending







| CPT Code | MDM (2 of 3 elements needed) | Problems (number & complexity) | Data | Risk |
|-------------|------------------------------------|---|---|---|
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- Severe exacerbation or progression of chronic illness
- Severe side effects of treatment having a significant risk of morbidity and may require hospital level of care



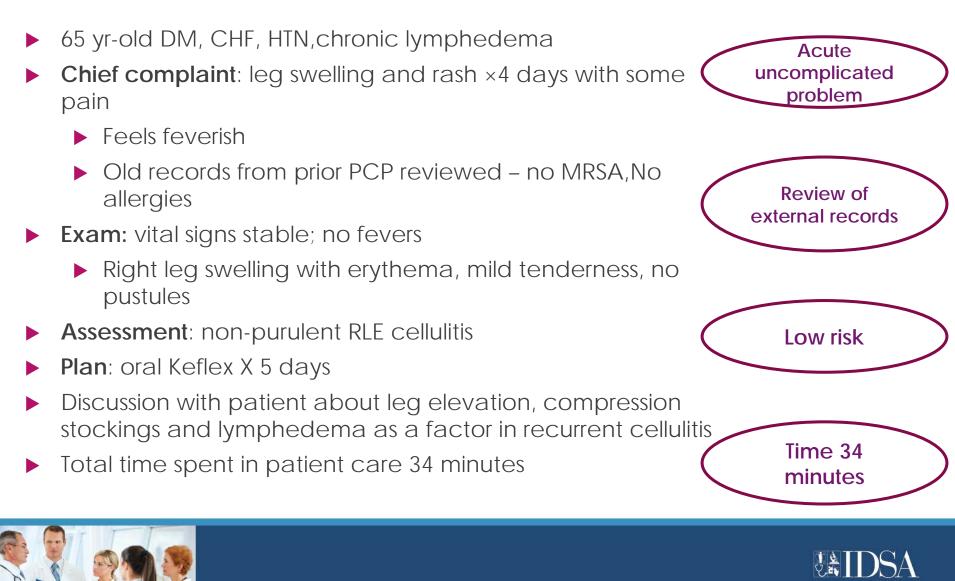


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- Threat to life or bodily function in <u>near term without treatment</u> due to
- Acute illness with systemic symptoms
- Acute complicated injury
- Chronic illness or injury with exacerbation and/ or progress
- Side effects of treatment







| CPT Code | MDM (2 of 3 elements needed) | Problems (number & complexity) | Data | Risk |
|-------------|---------------------------------------|--|--|--|
| 99202/99212 | Straightforwar d | 1 self-limited orMinor problem | Minimal | Minimal |
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Time-Based Coding

| New Patient | | | | | |
|-------------------------|-------|-------|-------|-------|-------|
| Level | 99202 | 99203 | 99204 | 99205 | |
| Time spent (minutes) | 15-29 | 30-44 | 45-59 | 60-74 | |
| Established Patient | | | | | |
| Level | 99211 | 99212 | 99213 | 99214 | 99215 |
| Time spent (minutes) | NA | 10-19 | 20-29 | 30-39 | 40-54 |

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