

## Coding for Chaplain Services APPROVED!

*TO: NHPCO Provider and State Members*

*FROM: NHPCO Regulatory Team*

*Date: October 31, 2022*

### Summary at a Glance

CMS held its first meeting of 2022 for consideration of changes to the [Healthcare Common Procedure Coding System \(HCPCS\) coding system](#) on June 7-10, 2022. Decisions of the committee were released recently, including a decision on the three chaplain codes.

Three HCPCS codes for chaplains were **APPROVED as follows:**

HCPCS Level II code Q9001: Assessment by chaplain services

HCPCS Level II code Q9002: Counseling, individual, by chaplain services

HCPCS Level II code Q9003: Counseling, group, by chaplain services

All new coding actions will be effective October 1, 2022.

CMS will release more detailed guidance on how these codes will be used in the coming days.

For the second year, the Healthcare Chaplaincy Network submitted a request to establish three codes for chaplains, consistent with the chaplain codes approved for use in the Department of Veterans Affairs (VA). NHPCO has worked with the Healthcare Chaplaincy Network on this issue for some time and has long been supportive of adding chaplain HCPCS codes. Several requests were submitted by NHPCO for the addition of chaplain codes so that hospices could record chaplain visits on the claim form.

Comments from the Healthcare Chaplaincy Network included:

“The speaker [Reverend George Handzo] asserted that CMS suggested chaplains cannot be included in a quality measure because chaplain visits cannot be tracked. On the other hand, CMS did not approve the HCPCS Level II code request that would provide that standard measure needed. Revising Q9001, Q9002, and Q9003 will provide the mechanism for gathering data on chaplain visits and open the door for inclusion of chaplains in quality measures such as NQF 3645. Through this measure and other measures, the Chaplain services will improve the quality of whole person care that every beneficiary deserves.”

The CMS committee’s response was that there was not a claims-based need for these chaplain codes.

In the HCPCS Application Summary, CMS also noted that Ascension (a large non-profit Catholic health system) also submitted comments to support the request to revise existing HCPCS Level II codes to identify Chaplain services, noting that it is also an insurer through Medicare Advantage and is providing Spiritual Care using chaplain services as a primarily health related optional supplemental benefit. Now CMS had a claims-based reason for chaplain HCPCS codes. The paragraph is noted below for detailed reference:

[Ascension] is one of the leading non-profit and Catholic health systems in the United States. Ascension currently offers Medicare Advantage (MA) coverage through a joint venture (JV) – Ascension Complete (AC) – across eight states. Ascension functions as an insurer directly and through JVs with other insurance providers. Their products include ACA Marketplace plans, Medicaid, and Medicare Advantage (MA). Ascension specifically highlighted Ascension Complete (AC) plan for which **CMS recently authorized the offering of Spiritual Care using chaplain services as a primarily health related optional supplemental benefit.** In other words, the Ascension Complete MA plan covers members' use of chaplain services, primarily as offered by in-network Ascension chaplains through a dedicated Spiritual Care program.

Ascension also indicated that based on their experience to date with the Special Supplemental Benefits for the Chronically III (SSBCI) offering, **they anticipate that this expanded supplemental benefits offering will lead to more of their ACJV members utilizing the spiritual care benefit as part of the healthcare they obtain through in-network Ascension providers and facilities, which in turn, will require Ascension chaplains to submit claims for services provided.**

**CMS Final HCPCS Coding Decision:** We appreciate the comments provided in response to CMS' published preliminary recommendation. Based on the information provided in the application and after consideration of the comments we received from another insurer indicating a claims processing need for reporting chaplain activity, CMS is revising its preliminary recommendation and finalizing the decision to:

**Revise HCPCS Level II codes:**

HCPCS Level II code Q9001: Assessment by chaplain services

HCPCS Level II code Q9002: Counseling, individual, by chaplain services

HCPCS Level II code Q9003: Counseling, group, by chaplain services

Source documents for this decision include:

1. Published [HCPCS Application Summary](#) (see item #9 beginning on page 167)
2. [October 2022 HCPCS Quarterly Update](#)

Any questions? Please submit questions related to this change to [regulatory@nhpco.org](mailto:regulatory@nhpco.org).