

**On behalf of Vision Expo, we sincerely  
thank you for being with us this year.**

**Vision Expo Has Gone Green!**

We have eliminated all paper session evaluation forms. Please be sure to complete your electronic session evaluations online when you login to request your CE Letter for each course you attended! Your feedback is important to us as our Education Planning Committee considers content and speakers for future meetings to provide you with the best education possible.



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**Dry Eye Billing and Coding:  
Maximize your profit**

**Crystal M. Brimer, OD, FAAO**  
**Dry Eye Institute**  
Wilmington, NC



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Dr. Crystal Brimer has received honorarium from Abbvie, B&L, Biotissue, MDelite, NuSight, and Oculus in the past 3 years.

She is on the Speakers Beaureau for B&L, Biotissue, Oculus, NuSight, and Sun.

She is on medical advisory board for NuSight and B&L.

She receives royalties from Oculus.

She no longer has a relationship with Mdelite.

#### Financial Conflicts include:

- Dry Eye Institute: Founder
- Vision Source: Dry Eye Protocol I (2017) and II (2022)
- Oculus: Crystal Tear Report/5M platform, consultant and speaker
- MD Elite: PAST Advisor and speaker
- Biotissue: Speaker
- Abbvie: Consultant
- NuSight: Medical advisory board
- Bausch & Lomb: Speaker and Consultant
- Dompe: Clinical trial
- Sun: Consultant and speaker

*\*All relevant financial relationships have been mitigated. The content of this COPE Accredited CE activity was planned and prepared independently by Dr. Crystal Brimer without input from members of an ineligible company.*



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## first things first...

billing the office visit

92 codes vs 99 codes



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**AOACodingToday** - Use name and password same as AOA login. CRT, HCPCS codes, ICD-10 codes, Modifiers, and more.

**New AOA.org Layout**

Scroll to bottom of page. Click "Ask The Coding Experts?"

Take us to "Medical Records and Coding Resources"

Click "AOACodingToday" to access the new coding tool

Slides are courtesy of Dr. Rebecca Wartman, AOA Coding Committee

92094 & 92014 : 8 exam elements in 7 1 session w/ Hx, and observation, external/ophthalmoscopy, gross VF, assessment, initiation of Ds & Tx plan

92002 & 92012 : 7 exam elements w/ new or existing prob + complication. To include Hx, and observation, external, & adnexa. May include SLE, dilation, IOP

Change the Double refractions only - ex: final MR in case per eye.

8 codes (90620, 9421) for healthy, private pay exams that include refraction (90000 LAMB, 52992 CL) if medical Ds, use '99-- codes instead.

Modifiers: 50 - bilateral, 24 - unrelated w/ E/O, 25 - separate pres. Same d.o.s., 55 - P/O care only, E2 - induced service for same fee, 51 - medl pres., RT/LT, E3 - LUL, E2 - LLL, E3 - RUL, E4 - REL.


**Disclaimer:** Rates and reimbursement will vary. Please review local regulations according to the carriers in your zip code. I.e. HCBS of NC considers all 92-- codes as routine codes.

**EYE EXAM ELEMENTS**

**Visual acuity**  
 Gross visual fields  
 EOM's  
 Reflex  
 Alignment  
**Conjunctiva**  
 Bulbar  
 Palpebral  
**Ocular adnexa**  
 Lids  
 Lacrimal gland  
 Lacrimal drainage  
 Oculis  
 Preauricular nodes  
**Peril and iris**  
 Size  
 Shape  
 Direct and consensual reflexion  
 Morphology  
**Cornea (Hx temp):**  
 Tear film  
 Epithelium  
 Striae  
 Exudation

**Anterior chamber (Hx temp):**  
 Depth  
 Cells  
 Flare  
**Lens**  
 Clarity  
 Anterior capsule  
 Posterior capsule  
 Cortex  
 Nucleus  
**Intraocular pressure:**  
 \*Be sure to note if it has been deferred due to trauma, infection or poor cooperation.  
**Optic nerve-discs:**  
 ICD ratio  
 Appearance  
 Nerve fiber layer  
**Retina and vessels**

**Observation Time, Plans, Peris and/or Medial and After**  
 \*Always the (M) element for comprehensive EAM exam



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## 992XX CODING:

You have TWO options

Use traditional medical justification guidelines, BEING CERTAIN to diagnose each OSD issue to show management of multiple conditions

Code	Level of MDW (Based on 2 out of 3 elements of MDW)	Number and Complexity of Problems Addressed	Amount and/or Complexity of Data to be Reviewed and Analyzed <i>*Each unique test, study, or document contributes to the combination of 2 or combination of 3 in Category 1 below</i>	Risk of Complications and/or Mortality or Morbidity of Patient Management
99201 99202	N/A Straightforward	N/A Minimal + 1 self limited or minor problem	N/A Minimal or none	N/A Minimal risk of morbidity from additional diagnostic testing or treatment
99203 99213	Low	Low + 2 or more self limited or minor problems; or + 1 stable, chronic illness; or + 1 acute, uncomplicated illness or injury; or + 1 stable, acute illness; or + 1 acute, uncomplicated illness or injury requiring hospitalization or observation level of care	Limited (Must meet the requirements of at least 1 out of 2 categories Category 1, Test and observation. • Any combination of 2 from the following: - Review of prior external tests; From each unique source; - Review of the results of each unique test; - Ordering of each unique test; Category 2: Assessment requiring an independent interpretation (for the categories of independent interpretation of tests and discussion of management or test interpretation, see moderate or high)	Low Low risk of morbidity from additional diagnostic testing or treatment.
99204 99214	Moderate	Moderate + 3 or more chronic illnesses with associated progression, or side effects of treatment; or + 2 or more stable, chronic illnesses; or + 1 undiagnosed/low problem with uncertain prognosis; or + 1 acute illness with systemic symptoms; or + 1 acute, complicated injury	Moderate (Must meet the requirements of at least 1 out of 2 categories) Category 1: Tests, documents, or independent interpretation • Any combination of 2 from the following: - Review of prior external tests; From each unique source; - Review of the results of each unique test; - Ordering of each unique test; • Assessment requiring an independent interpretation; or Category 2: Assessment requiring an independent interpretation of tests • Independent interpretation of a test performed by another physician/other qualified health care professional (not necessarily 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 course (not necessarily 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 or treatment significantly limited by usual assessments of health
99205 99215	High	High + 4 or more chronic illnesses with associated progression, or side effects of treatment; or + 3 acute or chronic illness or injury that poses a threat to the or bodily function	Extensive (Must meet the requirements of at least 2 out of 3 categories) Category 1: Tests, documents, or independent interpretation • Any combination of 3 from the following: - Review of prior external tests; From each unique source; - Review of the results of each unique test; - Ordering of each unique test; • Assessment requiring an independent interpretation; or Category 2: Assessment requiring an independent interpretation of tests • Independent interpretation of a test performed by another physician/other qualified health care professional (not necessarily 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 course (not necessarily reported)	High 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 or escalation of hospital level care • Decision not to resuscitate or to de-escalate care because of poor prognosis • Decision regarding potential confined subspace

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**2. Track doctor time, unrelated to a test or procedure, not including staff time, and apply time guidelines**

**E&M CODE CHANGES**

Most significant change for office-based evaluation and management (E&M) codes when using time to determine code level

- Revised to indicate required time thresholds that must be met
- No longer a time range
- Any prolonged time (99417 or G2212) reporting requires a minimum of 15 minutes per unit used beyond the times indicated for 99205 or 99215 codes



**The new times are as follows:**

99211: Not applicable	
99202: 15 minutes must be met/exceeded	99212: 10 minutes must be met/exceeded
99203: 30 minutes must be met/exceeded	99213: 20 minutes must be met/exceeded
99204: 45 minutes must be met/exceeded	99214: 30 minutes must be met/exceeded
99205: 60 minutes must be met/exceeded	99215: 40 minutes must be met/exceeded

Slide is courtesy of Dr. Rebecca Wartman, AOA Coding Committee

**Instructions for Selecting a Level of Office or Other Outpatient E/M Service**

Select the appropriate level of E/M services based on the following:

- The level of the medical decision making as defined for each service; or
- The total time for E/M services performed on the date of the encounter;

Physician or other qualified health care professional time includes the following activities, when performed:

- preparing to see the patient (eg, review of tests)
- obtaining and/or reviewing separately obtained history
- performing a medically appropriate examination and/or evaluation
- counseling and educating the patient/family/caregiver
- ordering medications, tests, or procedures
- referring and communicating with other health care professionals (when not separately reported)
- documenting clinical information in the electronic or other health record
- independently interpreting results (not separately reported) and communicating results to the patient/family/caregiver
- care coordination (not separately reported)

When the physician or other qualified health care professional is reporting a separate CPT code that includes interpretation and/or report, the interpretation and/or report should not be counted in the medical decision making when selecting a level of office or other outpatient service. When the physician or other qualified professional is reporting a separate service for discussion of management with a physician or other qualified health care professional, the discussion is not counted in the medical decision making when selecting a level of office or other outpatient service.

Excerpt from <https://www.ama-assn.org/system/files/2019-06/cpt-office-prolonged-svs-code-changes.pdf>



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Slides are courtesy of Dr. Rebecca Wartman, AOA Coding Committee

**CMS Final Rule Comments**

Take Time Now: Patient (2019) Prolonged Services Coding

Take Time Now: Stationary Patient (2019) Prolonged Services Coding

**CMS Prolonged Services Required Times G2212 (Blue box) vs CPT Required Times (Green) 99417**

**Prolonged Clinical Staff Services**

Total Duration of Prolonged Services	Code(s)	Requires Direct Physical Supervision
less than 45 minutes	Not reported separately	
45-74 minutes (45 minutes - 1 hr, 14 min.)	99415 X 1	
75-104 minutes (1 hr, 15 min. - 1 hr, 44 min.)	99415 X 1 AND 99416 X 1	
105 or more (1 hr, 45 min. or more)	99415 X 1 AND 99416 X 2 or more for each additional 30 minutes.	

Clinical Staff Time for prolonged services would be RARELY if ever used in eye care and requires a full hour of dedicated staff time outside of the time they might spend for any E&M services

**DAYONE MEDICARE PROLONGED SERVICES**

A		B		C		D		E		F		G		H		I		J		
From		To		Place of Service	EMG	CPT (ICPCS)	Modifier	Diagnosis Pointer	S. Charges	Days or Units	ID Qual	Billing Provider (2)	ID	Qual	Billing Provider (2)	ID	Qual	Billing Provider (2)	ID	
MM	DD	YY	MM																	DD
1	1	2021	1	1	1	2021	11	Day	99215		A,B	180.00	1		NPI	XXXXXXXX				
1	1	2021	1	1	1	2021	11	Day	G2212		A,B	35.00	1		NPI	XXXXXXXX				

**MEDICARE EXAMPLE: Use G2212**

A		B		C		D		E		F		G		H		I		J		
From		To		Place of Service	EMG	CPT (ICPCS)	Modifier	Diagnosis Pointer	S. Charges	Days or Units	ID Qual	Billing Provider (2)	ID	Qual	Billing Provider (2)	ID	Qual	Billing Provider (2)	ID	
MM	DD	YY	MM																	DD
1	1	2021	1	1	1	2021	11	Day	99215		A,B	180.00	1		NPI	XXXXXXXX				
1	1	2021	1	1	1	2021	11	Day	99417		A,B	35.00	1		NPI	XXXXXXXX				

**COMMERCIAL PAYER EXAMPLE: Use 99417 instead of G2212**

**AVERAGE MEDICARE REIMBURSEMENT:**

- 99215 - \$177.47
- G2212 - \$31.76 "Prolonged Service With/Without Direct Patient Contact on the Date of an Office or Other Outpatient Service"
- 99415 - \$20.30 "Prolonged Clinical Staff Services With Physician or Other Qualified Health Care Professional Supervision"
- 99416 - \$9.50 "Prolonged Clinical Staff Services With Physician or Other Qualified Health Care Professional Supervision"

**THINGS YOU MUST KNOW:**

- You no longer must have the majority of the time spent on "counseling and coordination of care," so this documentation is no longer necessary, but you must document your time.
- You can only use these codes if you are billing the E/M service via "time" and not Medical Decision Making
- Time spent performing separately reported services other than the E/M service is not counted toward the time to report 99205, 99215 and prolonged services time.
- Tests without their own CPT codes (TBTU, Schirmer, vital dyes) will count as time BUT not for the Data section of Medical Decision Making
- See the rules above as to what activities are applicable

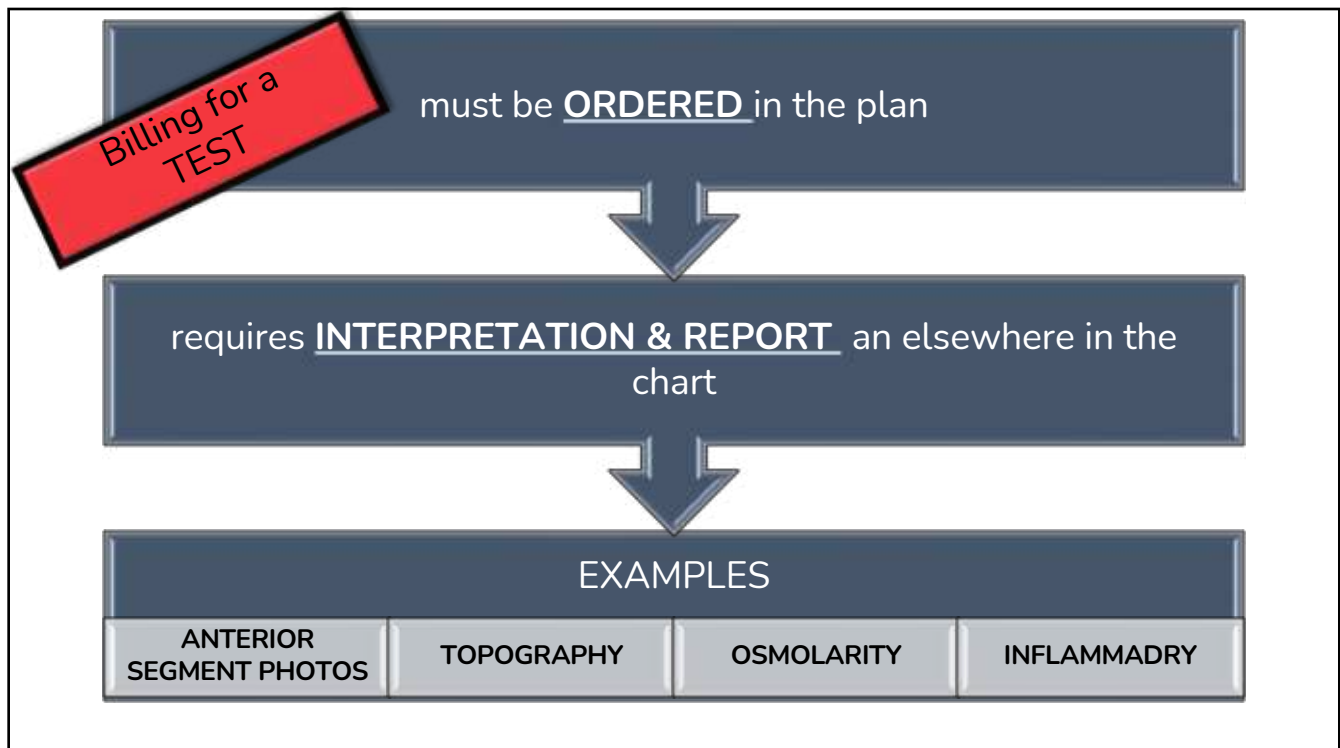


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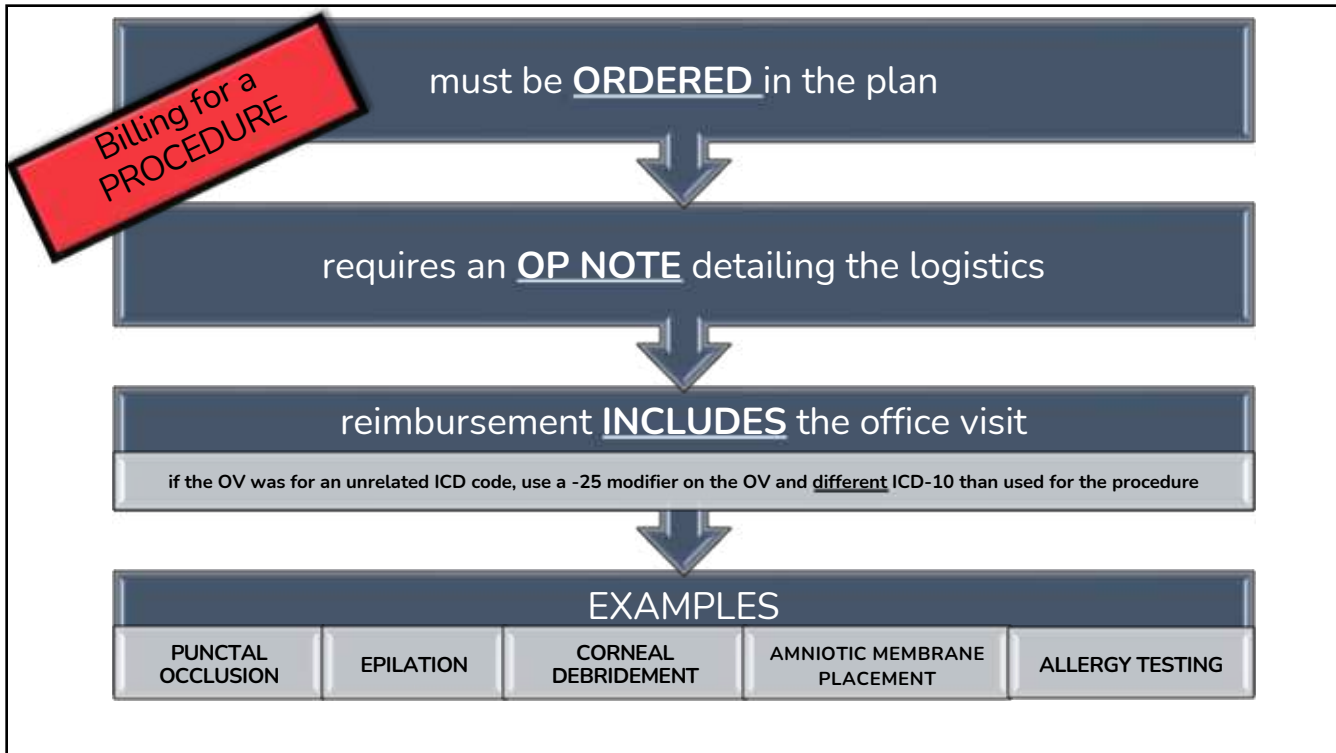
# the 3 billing rules you should memorize

seriously

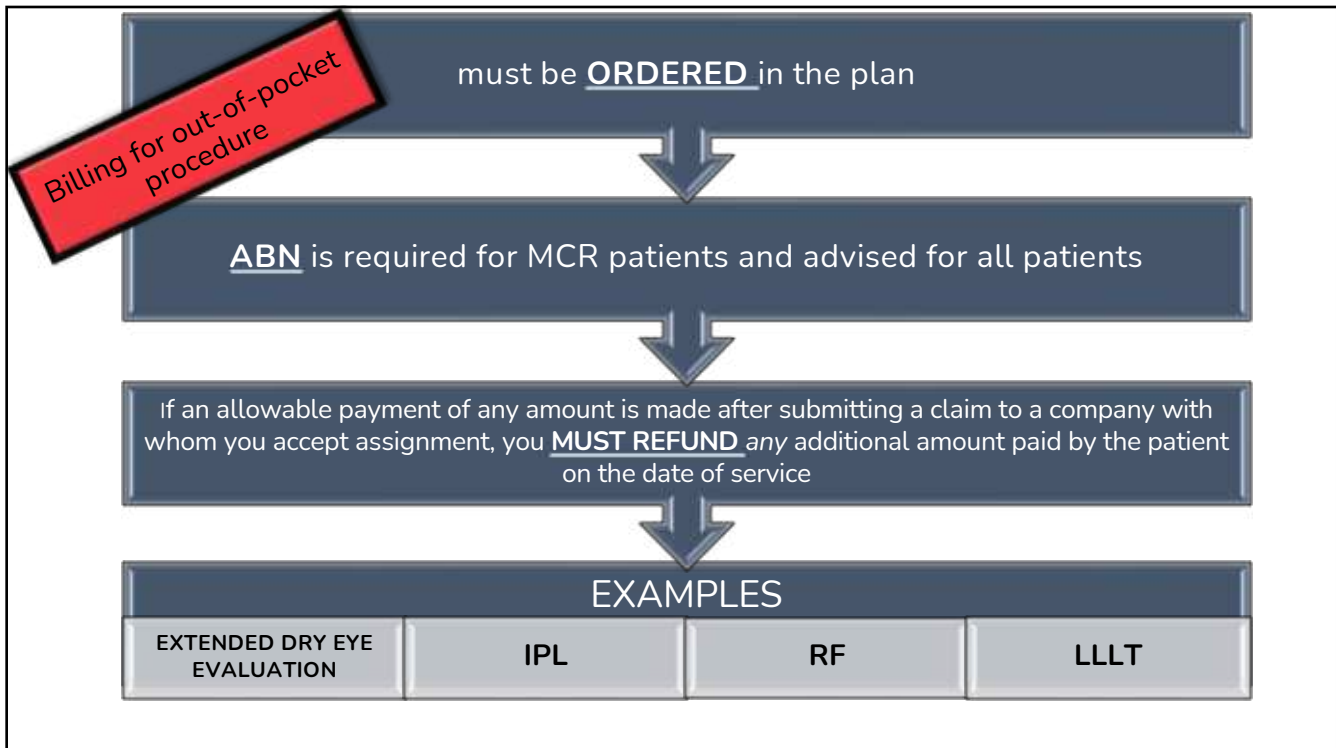
9



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### A WORD ON PRIOR AUTHORIZATIONS

- PAs are often quicker and more successful if completed over the phone!
- However, for OptumRx or Express scripts, covermyeds.com is likely the fastest way to get a response
- There's no such thing as too MUCH information! Include:
  - EVERY OTC and Rx ever used (with dates if possible)
  - Detailed symptoms
  - All prior test findings
  - Diagnosis list
- Submit a PA even if the pharmacy doesn't initiate one. Often the PA will still result in approval even if you received a Change Request instead


<https://www.covermyeds.com/>

**Apex Pharmacy : 681.207.7334**

- Apex will perform the PA for you once give the proper information
- You provide Diagnosis, past medication history, and any helpful test results via "pharmacy notes" section on the prescription that is faxed or e-scribed directly to Apex Pharmacy
- If PA is approved: Apex automatically fills the prescription and mails it directly to the patient at no additional cost
- If PA is denied: Apex will contact you directly and ask for your second choice. HOWEVER, as a time saver, they keep a list of my preferences and proceed accordingly.
- Example, if a prescription is denied for Cequa they will automatically go to my second choice and then third choice if required. After 30 days, they will contact the patient and send a new PA for the first choice prescription again.

**Pinnacle Health Group**

- <https://thepinnaclehealthgroup.com/>
- Obtain log-in from your Biotissue rep
- A service provided by Biotissue to ensure PAs are acquired when needed and that payments are received for Prokera. They can also help with claim appeals if denied
- Go to the cases tab at the top of the screen and create a new case, in this tab you will enter the case type (Prior Auth or Denial appeal), product information (Prokera), Physicians name, patients name, DOB, and address
- Input the patient's insurance information, procedure code, ICD-10, place of service, and procedure date
- The authorization is pulled and you will know if there are any issues before placement, such as ATD or non-coverage



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# Updated ABN form for 2024

**Don't forget:  
Good Faith Estimates are required by the No Surprises Act**

**(ABN)**

**NOTE: If Medicare doesn't pay for D. \_\_\_\_\_ below, you may have to pay.**  
 Medicare does not pay for everything, even some care that you or your health care provider have good reason to think you need. We expect Medicare may not pay for the D. \_\_\_\_\_ below.

D.	E. Reason Medicare May Not Pay:	F. Estimated Cost

**WHAT YOU NEED TO DO NOW:**

- Read this notice, so you can make an informed decision about your care.
- Ask us any questions that you may have after you finish reading.
- Choose an option below about whether to receive the D. \_\_\_\_\_ listed above.

**Note:** If you choose Option 1 or 2, we may help you to use any other insurance that you might have, but Medicare cannot require us to do this.

**G. OPTIONS: Check only one box. We cannot choose a box for you.**

**OPTION 1.** I want the D. \_\_\_\_\_ listed above. You may ask to be paid now, but I also want Medicare billed for an official decision on payment, which is sent to me on a Medicare Summary Notice (MSN). I understand that if Medicare doesn't pay, I am responsible for payment, but I can appeal to Medicare by following the directions on the MSN. If Medicare does pay, you will refund any payments I made to you, less co-pays or deductibles.


**OPTION 2.** I want the D. \_\_\_\_\_ listed above, but do not bill Medicare. You may ask to be paid now as I am responsible for payment. I cannot appeal if Medicare is not billed.

**OPTION 3.** I don't want the D. \_\_\_\_\_ listed above. I understand with this choice I am not responsible for payment, and I cannot appeal to see if Medicare would pay.

**H. Additional information:**

This notice gives our opinion, not an official Medicare decision. If you have other questions on this notice or Medicare billing, call 1-800-MEDICARE (1-800-633-4227/TTY: 1-877-486-2048). Signing below means that you have received and understand this notice. You may ask to receive a copy.

You have the right to get Medicare information in an accessible format, like large print, Braille, or audio. You also have the right to file a complaint if you feel you've been discriminated against. Visit [Medicare.gov/accessibility-nondiscrimination-notice](https://www.medicare.gov/accessibility-nondiscrimination-notice).



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Sample pre-certification letter

**Sample Letter for Pre-Certification**

Date \_\_\_\_\_

[Insurer Name] [Attn: \_\_\_\_\_] [Street Address] [City, State, Zip Code]

Re: [Patient Name] [Patient's Identification Number]

Dear [Insurer]:

This letter is to request pre-certification for punctal occlusion with plugs for the treatment of dry eye syndrome, or keratoconjunctivitis sicca (KCS). This letter provides the clinical rationale for performing the procedure along with a description of the procedure.

**Background**

An estimated 50 to 60 million Americans suffer from dry eye syndrome. Common treatments include ointments, eye drops, protective glasses and anti-inflammatory therapy. In cases where these treatments are ineffective or contraindicated, surgical intervention may be warranted. Punctal occlusion is a safe and effective treatment for KCS, as well as ocular surface disease, reflex tearing, and other conditions caused by dry eyes.

Punctal occlusion with plugs is used for moderate to severe dry eye sufferers to help retain tear fluid by stemming drainage. It may also enhance the delivery and absorption of topical medications in the eye. This procedure may prevent more serious corneal disease and facilitate a return to contact lenses.

**Patient's Diagnosis and Clinical Rationale for Selecting Treatment:** The history and clinical course of [Patient Name]'s dry eye syndrome is as follows:

[Please insert a paragraph discussing your patient's diagnosis and history. Include copies of test results, a complete summary of all previous treatments (including treatment response or failure) and documentation of clinical improvements and failures.]

A variety of treatments are available to individuals with dry eye syndrome. Selecting the most appropriate treatment depends on a thorough evaluation of all the relevant factors that could cause or contribute to the condition. Because of [Patient Name]'s continued battle with dry eye syndrome and despite prior treatment with artificial tears and after careful examination and review of this patient's condition, I would like to perform punctal occlusion with plugs.


**Treatment Description**

The physician gently places <Named Plug> into the punctum. Inside the punctum, the plug expands in width, adjusting itself to fit the punctum.

**Request for Coverage Approval**

Dry eye syndrome is a serious and often neglected ophthalmic condition. Unfortunately [Patient Name] has received other available therapies without success. In light of the patient's medical history, it is my opinion that this procedure is medically necessary. I request that you consider coverage of this procedure and provide pre-certification. If you have any further questions about this procedure, please contact me at [Phone].

Sincerely,  
[Physician Name]



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Sample Op Note

**Sample Operative Report: Punctal Occlusion with Plugs**

Date: \_\_\_\_\_ Patient's name: \_\_\_\_\_

Preoperative diagnosis: Dry eye syndrome Postoperative diagnosis: Dry eye syndrome Procedure: Punctal occlusion with <Named Plug> [Indicate lid]


The patient has been previously diagnosed with dry eye syndrome and treated with a number of different artificial tears with little or no improvement. The procedure, alternatives, risks and possible complications have been explained to the patient and the patient has given consent for punctal occlusion with <Named Plug>. No guarantee or assurance has been given to the patient as to the results that may be obtained.

<Named Plug> was removed from its package with forceps and the distal end was gently inserted into the punctum at slit lamp. A drop of topical antibiotics was instilled afterwards.

The procedure was repeated for the other punctum.

The patient tolerated the procedure well and left in good condition. The postoperative instructions were given including the medications as well as a follow-up appointment. Signs of infection explained and patient was instructed to return to office at first onset.

Physician's signature \_\_\_\_\_



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# Sample letter of appeal

**Sample Letter of Appeal for Claims Denied Coverage**

Date

[Insurer Name] [Attn: \_\_\_\_\_] [Street Address] [City, State, Zip Code]

Re: [Patient Name] [Patient's Identification Number]

Dear [Insurer]:

This letter is in response to your denial of the enclosed claim for punctal occlusion with plugs for the treatment of dry eye syndrome or keratoconjunctivitis sicca (KCS). I am submitting this claim for reconsideration. This letter provides the clinical rationale for performing the procedure along with a description of the procedure.

**Background**

An estimated 50 to 60 million Americans suffer from dry eye syndrome. Common treatments include ointments, eye drops, protective glasses and anti-inflammatory therapy. In cases where these treatments are ineffective or contraindicated, surgical intervention may be warranted. Punctal occlusion is a safe and effective treatment for KCS, as well as ocular surface disease, reflex tearing, and other conditions caused by dry eyes.

Punctal occlusion with plugs is used for moderate to severe dry eye sufferers to help retain tear fluid by stemming drainage. It may also enhance the delivery and absorption of topical medications in the eye. This procedure may prevent more serious corneal disease and facilitate a return to contact lenses.

**Patient's Diagnosis and Clinical Rationale for Selecting Treatment:** The history and clinical course of [Patient Name]'s dry eye syndrome is as follows:

[Please insert a paragraph discussing your patient's diagnosis and history. Include copies of test results, a complete summary of all previous treatments (including treatment response or failure) and documentation of clinical improvements and failures.]

A variety of treatments are available to individuals with dry eye syndrome. Selecting the most appropriate treatment depends on a thorough evaluation of all the relevant factors that could cause or contribute to the condition. Because of [Patient Name]'s continued battle with dry eye syndrome and despite prior treatment with artificial tears and after careful examination and review of this patient's condition, I would like to perform punctal occlusion with plugs.

**Treatment Description**

The ophthalmologist or optometrist gently places <Named Plug> into the punctum. Inside the punctum, the plug expands in width, adjusting itself to fit the punctum.

**Request for Coverage Approval**

Dry eye syndrome is a serious and often neglected ophthalmic condition. Unfortunately [Patient Name] has received other available therapies without success. In light of the patient's medical history, it is my opinion that this procedure is medically necessary. I request that you reconsider coverage of this procedure and pay my claim for reimbursement. If you have any further questions about this procedure, please contact me at [Phone].

Sincerely,

[Physician Name]



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# Sample letter of medical necessity

Date: \_\_\_\_\_ Insurance Company/Payer Name: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 City, State, Zip Code: \_\_\_\_\_

**RE: Letter of Medical Necessity for LipiFlow® Thermal Pulsation System**

Patient/Member Name: \_\_\_\_\_  
 Patient/Member Number: \_\_\_\_\_  
 Group Number: \_\_\_\_\_

To Whom It May Concern:

Writing on behalf of patient, (patient name) to document the medical necessity of LipiFlow® System for treatment of Meibomian Gland Disease/Disorder. This letter provides information about the patient's medical history and diagnosis and a statement summarizing the treatment rationale.

**Patient's Medical History and Diagnosis:**  
 (information regarding patient's condition and specific diagnosis)  
 (Patient's diagnosis, date of diagnosis, lab results and date, current condition, and history)  
 (Previous therapies and procedures the patient has undergone for management of their condition)  
 (Patient's response to these therapies)  
 (Brief description of the patient's recent symptoms and conditions)

(Patient Name) is a (age)-year-old (male/female) diagnosed with MGD/DED. (Patient Name) has been receiving care since (first exam date). As a result of MGD/DED, my patient (brief description of patient history). Additionally, (patient) has tried (prev. Tx, warm compress, etc...) and (outcomes/NT).

**Treatment Rationale:**  
 (information on treatment up to this point, course of care, and why LipiFlow® System is necessary and how it is expected to help the patient)  
 Based on the above facts, I am confident that you will agree that LipiFlow® System is indicated and medically necessary for this patient.  
 Considering the patient's history, condition, and the full supported uses of LipiFlow®, I believe treatment with LipiFlow® at this time is warranted, appropriate, and medically necessary, and should be a covered and reimbursed service.

**Duration:**  
 The LipiFlow® System treatment takes 12 minutes for each eye. The results are known to last 9-15 months. It may be necessary to repeat the LipiFlow® System treatment annually.

**Summary:**  
 In summary, LipiFlow® System is medically necessary for this patient's dry eye condition. Please consider coverage, approve use, and subsequent payment for LipiFlow® System as planned. If any additional information is required to ensure the approval of LipiFlow® System, please do not hesitate to call at (telephone number). Thank you for your prompt attention to this matter.

Sincerely,  
 (Physician's Name and provider identification number)  
 (Physician's Signature)



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**ANTERIOR SEGMENT PHOTOGRAPHY: CPT**

A		Date(s) of Service				B	C	D	E			F	G	H	I	J
From		To				Place of Service	EMG	CPT / HCPCS	Modifier	Diagnosis Pointer	S Charges	Days or Units	Ready Plan	ID Qual	Rendering Provider ID #	
MM	DD	YY	MM	DD	YY											
1	1	2018	1	1	2018	11	Day	99214		A,B,C,D	110.00	1		NPI	XXXXXXXXXX	
1	1	2018	1	1	2018	11	Day	92285		A,B,C	20.00	1		NPI	XXXXXXXXXX	

**AVERAGE MEDICARE REIMBURSEMENT:**  
 • \$22.92

**THINGS YOU MUST KNOW:**

- Bill bilaterally, 1 line
- External photos are medically warranted when it will affect your decision making
- Must order the test in the plan
- Must include an Interpretation and Report in the record

**APPLICABLE DIAGNOSIS CODES:**

UNSPECIFIED BLEPHARITIS	OD UL	H01.001			OS UL	H02.34
	OD LL	H01.002			OS LL	H02.35
	OS UL	H01.004	UNSPECIFIED PTOSIS		OU	H02.403
	OS LL	H01.005			OD	H02.401
SENILE ECTROPION	OD UL	H02.131			OS	H02.402
	OD LL	H02.132	DERMATOCHALASIS		OD UL	H02.831
	OS UL	H02.134			OD LL	H02.832
	OS LL	H02.135			OS UL	H02.834
UNSPECIFIED LAGOPHTHALMOS	OD UL	H02.201			OS LL	H02.835
	OD LL	H02.202	DRY EYE SYNDROME		OU	H04.123
	OS UL	H02.204			OD	H04.121
	OS LL	H02.205			OS	H04.122
BLEPHAROCALASIS	OD UL	H02.30	UNSPECIFIED ACUTE CONJUNCTIVITIS		OU	H10.31
	OD LL	H02.32			OD	H10.31

	OS	H10.32	EXPOSURE KERATOCONJUNCTIVITIS		OU	H16.213
UNSPECIFIED CHRONIC CONJUNCTIVITIS	OU	H10.403			OD	H16.211
	OD	H10.401			OS	H16.212
	OS	H10.402	KERATOCONJUNCTIVITIS SICCA, NOT SPECIFIED AS SJOGREN'S		OU	H16.223
		H10.45			OD	H16.221
UNSPECIFIED CHRONIC ALLERGIC CONJUNCTIVITIS	OU	H10.503			OS	H16.222
UNSPECIFIED BLEPHAROCONJUNCTIVITIS	OD	H10.501	NEUTROTROPHIC KERATOCONJUNCTIVITIS		OU	H16.233
	OS	H10.502			OD	H16.231
PINGUECULA	OU	H11.153			OS	H16.232
	OD	H11.151	UNSPECIFIED INTERSTITIAL KERATITIS		OU	H16.303
	OS	H11.152			OD	H16.301
PINGUECULITIS	OU	H10.813			OS	H16.302
	OD	H10.811	SCLEROSING KERATITIS		OU	H16.333
	OS	H10.812			OD	H16.331
CONJUNCTIVAL CONCRETIONS	OU	H11.123			OS	H16.332
	OD	H11.121	UNSPECIFIED CORNEAL NEOVASCULARIZATION		OU	H16.403
	OS	H11.122			OD	H16.401
CONJUNCTIVAL HYPEREMIA	OU	H11.433			OS	H16.402
	OD	H11.431	PANNUS (CORNEAL)		OU	H16.423
	OS	H11.432			OD	H16.421
CONJUNCTIVOCHALASIS	OU	H11.823			OS	H16.422
	OD	H11.821	OTHER KERATITIS			H16.8
	OS	H11.822	UNSPECIFIED KERATITIS			H16.9
UNSPECIFIED EPISCLERITIS	OU	H15.103	ENDOTHELIAL CORNEAL DYSTROPHY			H18.51
	OD	H15.101				
	OS	H15.102	EPITHELIAL (JUVENILE) CORNEAL DYSTROPHY			H18.53
UNSPECIFIED SUPERFICIAL KERATITIS	OU	H16.103	LATTICE CORNEAL DYSTROPHY			H18.54
	OD	H16.101	MACULAR CORNEAL DYSTROPHY			H18.55
	OS	H16.102	OTHER HEREDITARY CORNEAL DYSTROPHIES			H18.59
FILAMENTARY KERATITIS	OU	H16.123	OTHER HEREDITARY CORNEAL DYSTROPHIES			H18.70
	OD	H16.121	UNSPECIFIED CORNEAL DEFORMITY			H18.793
	OS	H16.122	OTHER CORNEAL DEFORMITIES			H18.791
PUNCTATE KERATITIS	OU	H16.143			OD	H18.791
	OD	H16.141			OS	H18.792
	OS	H16.142				

RECURRENT EROSION OF CORNEA	OU	H18.833
	OD	H18.831
	OS	H18.832
MEIBOMIAN GLAND DYSFUNCTION	OD UL	H02.881
	OD LL	H02.882
(unspecified lid)	OD	H02.883
	OS UL	H02.884
	OS LL	H02.885
(unspecified lid)	OS	H02.886
(unspecified eye / unspecified lid)		H02.889
	OD	H02.88 A
	OS	H02.88B
ROSSEA CONJUNCTIVITIS	OD	H10.821
	OS	H10.822
	OU	H10.823
(unspecified eye)		H10.829

**Disclaimer: Rules and reimbursement will vary to the carriers in your zip code.**



**TOPOGRAPHY: CPT 92025**

A		Date(s) of Service				B	C	D	E			F	G	H	I	J
From		To				Place of Service	EMG	CPT / HCPCS	Modifier	Diagnosis Pointer	S Charges	Days or Units	Ready Plan	ID Qual	Rendering Provider ID #	
MM	DD	YY	MM	DD	YY											
1	1	2018	1	1	2018	11	Day	99214		A,B,C,D	110.00	1		NPI	XXXXXXXXXX	
1	1	2018	1	1	2018	11	Day	92025		D	37.00	1		NPI	XXXXXXXXXX	

MEDICARE EXAMPLE

**AVERAGE MEDICARE REIMBURSEMENT:**

- \$35.69

**THINGS YOU MUST KNOW:**

- Can be billed same day as 92285, some private payers require 51 modifier (Multiple procedures/same day) on 92025 line
- MUST order the test in the plan
- MUST have an Interpretation and Report in the record

**APPLICABLE DIAGNOSIS CODES:**

UNSPECIFIED INTERSTITIAL KERATITIS	OU	H16.303	ENDOTHELIAL CORNEAL DYSTROPHY		H18.51
	OD	H16.301	EPITHELIAL CORNEAL DYSTROPHY		H18.52
	OS	H16.302	GRANULAR CORNEAL DYSTROPHY		H18.54
DIFFUSE INTERSTITIAL KERATITIS	OU	H16.323	MACULAR CORNEAL DYSTROPHY		H18.55
	OD	H16.321	OTHER HEREDITARY CORNEAL DYSTROPHIES		H18.59
	OS	H16.322			
SCLEROSING KERATITIS	OU	H16.333			
	OD	H16.331			
	OS	H16.332			

**Disclaimer: Rules and reimbursement will vary. Please review local regulations according to the carriers in your zip code.**



### MICROFLUIDIC ANALYSIS UTILIZING AN INTEGRA COLLECTION AND ANALYSIS DEVICE, TEAR OSMOLARITY: CPT 83861

A		B				C		D		E	F	G	H	I	J				
Date(s) of Service		From				To				Place of Service	EMG	CPT / HCPCS	Modifier	Diagnosis Position	5 Charges	Days or Units	Read y Plan	IB Qual	Rendering Provider ID#
M	M	DD	YY	MM	DD	YY													
1	1	2018	1	1	2018	11	Day	99214			A,B	110.00	1	NP	1		XXXXXXX	X	
1	1	2018	1	1	2018	11	Day	83861	QW	RT	A	23.00	1	NP	1		XXXXXXX	X	
1	1	2018	1	1	2018	11	Day	83861	QW	LT	A	23.00	1	NP	1		XXXXXXX	X	

**MEDICARE EXAMPLE**

A		B				C		D		E	F	G	H	I	J					
Date(s) of Service		From				To				Place of Service	EMG	CPT / HCPCS	Modifier	Diagnosis Position	5 Charges	Days or Units	Read y Plan	IB Qual	Rendering Provider ID#	
M	M	DD	YY	MM	DD	YY														
1	1	2018	1	1	2018	11	Day	99214			A,B	110.00	1	NP	1		XXXXXXX	X		
1	1	2018	1	1	2018	11	Day	83861	RT	A	23.00	1	NP	1		XXXXXXX	X			
1	1	2018	1	1	2018	11	Day	83861	S9	LT	A	23.00	1	NP	1		XXXXXXX	X		

**COMMERCIAL PAYER EXAMPLE** (some, not all)

**AVERAGE MEDICARE REIMBURSEMENT:**

- \$22.48

**THINGS YOU MUST KNOW:**

- Must have CLIA Waiver certificate before billing
- For Medicare: Must have QW modifier (indicates that the diagnostic lab service is a CLIA (Clinical Laboratory Improvement Amendments) waived test and that the provider holds at least a Certificate of Waiver) as well as location (RT/LT) modifier
- For some private insurances: Must have S9 modifier (distinct procedural service / used to unbundle services) on the second line
- Must have CLIA # on Line 19 "Additional Claim Information" of CMS 1500 form
- Must order the test in the plan
- Must have an Interpretation and Report in the record

**APPLICABLE DIAGNOSIS CODES:**

Code	Code	Code	Code	Code	
UNSPECIFIED BLEPHARITIS	OD UL	H101.001	OS	H10.812	
	OD LL	H101.002	OU	H11.123	
	OS UL	H101.004	OD	H11.121	
	OS LL	H101.005	OS	H11.122	
DRY EYE SYNDROME OF LACRIMAL GLAND	OU	H104.123	CONJUNCTIVAL HYPEREMIA	OU	H11.433
	OD	H04.121		OD	H11.431
	OS	H04.122		OS	H11.432
UNSPECIFIED ACUTE CONJUNCTIVITIS	OU	H10.33	UNSPECIFIED EPISCLERITIS	OU	H15.103
	OD	H10.31		OD	H15.101
	OS	H10.32		OS	H15.102
UNSPECIFIED CHRONIC CONJUNCTIVITIS	OU	H10.403	UNSPECIFIED SUPERFICIAL KERATITIS	OU	H16.103
	OD	H10.401		OD	H16.101
	OS	H10.402		OS	H16.102
UNSPECIFIED CHRONIC ALLERGIC CONJUNCTIVITIS	OU	H10.45	FILAMENTARY KERATITIS	OU	H16.123
UNSPECIFIED BLEPHAROCONJUNCTIVITIS	OU	H10.503		OD	H16.121
	OD	H10.501		OS	H16.122
	OS	H10.502	PUNCTATE KERATITIS	OU	H16.143
PINGUECULA	OU	H11.153		OD	H16.141
	OU	H11.151		OS	H16.142
	OS	H11.152	EXPOSURE KERATOCONJUNCTIVITIS	OU	H16.213
PINGUECULITIS	OU	H10.813		OD	H16.211
	OD	H10.811		OS	H16.212

**Disclaimer: Rules and reimbursement will vary to the carriers in your zip code.**

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## TearLab Tear Osmolarity Billing Guidance

This guide addresses billing recommendations for CPT® 83861, "Microfluidic analysis utilizing an integrated collection and analysis device, tear osmolality", a covered service by CMS Medicare under the Clinical Laboratory Fee Schedule. CLIA Certification is required to perform and bill laboratory tests.

**Billing Codes and Modifiers**

- CMS Medicare Part B**
  - 2018 allowable - \$22.48 per test (\$44.96 per patient) - no deductible or patient co-payment applies
  - Code CPT 83861 as one unit of service with LT/RT and QW modifiers on two lines, once for each eye tested:
    - 83861 QW RT (1 unit)
    - 83861 QW LT (1 unit)
  - Includes ordering physicians individual NPI number (NOT group NPI) in Box 17
  - Check "No" on Box 20
  - Include CLIA license number in Box 23
- CPT 83861 has universal coverage under CMS Part B Medicare. Claim denials from CMS are usually due to errors in coding or transmission of pertinent information by billing software. If any denial is received for CPT 83861 contact the TearLab Reimbursement Support Center promptly at [rsoc@tearlab.com](mailto:rsoc@tearlab.com) for assistance.
- Commercial Third Party, Medicare Advantage Part C and Medicaid**  
Reimbursement, coding and coverage policies will vary by carrier, provider contract and patient benefit plan. Contact the TearLab Reimbursement Support Center at [rsoc@tearlab.com](mailto:rsoc@tearlab.com) for payer specific billing guidance.

**Diagnostic Codes**

Medical necessity rules are met when a patient presents with a sign or symptom of dry eye as determined by the clinician, which should be documented in the patient's medical record. Codes commonly used for coding dry eye diagnosis and/or dry eye symptoms, as referenced in the clinical literature, are available on the "ICD-10 Coding for Dry Eye" brochure, available on the TearLab website.

Currently CMS has no National Coverage Determinations (NCD) that define diagnosis codes to bill for CPT 83861 tear osmolality test, so a decision to perform a test based on signs or symptoms of dry eye is up to the physician. Always ensure that all the items listed below in "Documenting a Laboratory Test" are included in the patient record to meet medical necessity guidelines.

**Documenting a Laboratory Test**

Medicare has several documentation requirements for laboratory tests such as tear osmolality, which must be noted in the patient chart or Electronic Health Record (EHR).

- The sign or symptom of disease that prompted the ordering of the test
- A notation in the medical record that a "tear osmolality test was ordered" with "tear osmolality" specifically identified
- The numerical tear osmolality test results and indication if the results were normal or abnormal
- Treatment/Management Plan - the medical action taken as a result of the tear osmolality test, and referencing the test results in the plan
- Managing clinician's signature at the end of the record indicating that everything in the record that day was reviewed and confirmed as medically necessary

Note that Medicare and most commercial payers do not cover screening tests. If a sign or symptom of dry eye, or a previously diagnosed but "unstable" dry eye under management, must be properly documented prior to submitting a claim for reimbursement for a tear osmolality test.

**What if the tear osmolality test is normal?**

If the tear osmolality test result is normal (dry eye is "noted out", code for the final ocular contact diagnosis, and the symptoms that prompted ordering the test may still be reported as additional diagnosis 1 if they are not fully explained or related to the contact diagnosis) (e.g. CMS Program Memorandum A2-03-144, Sept 28, 2011).

CMS coverage rules for laboratory tests state: "The testing of a person is not out or to confirm a suspected diagnosis because the patient has a sign and/or symptom of a diagnostic test, not a diagnosis. In those cases, the sign or symptom should be used to explain the reason for the test" (see: Post-Reg 04-06, No. 228, 10a-03, 2007).

**How often can I perform a tear osmolality test?**

Medical necessity as determined by the clinician determines how often a tear osmolality test may be performed and what accompanying patient documentation consisting of either a noted sign or symptom of disease, or a patient under treatment that is being managed for a previously diagnosed but "unstable" dry eye. Testing a patient with a prior history of dry eye without (current) signs or symptoms of disease would likely be considered a "screening" test.

All items related to "Documenting a Laboratory Test" must be included in the patient medical record to ensure proper support for multiple testing.

**Are there Global Period exclusions?**

No, laboratory tests do not apply to "global periods" exclusions for procedures such as the 12-09 global period for eyelid retraction and 90-day post-operative global exclusion for eyelid surgery. (see: Medicare Claims Processing Manual-Chapter 12, Section 40.9)

**TearLab requests that the office billing department NOT send flow to resolve billing issues for CPT 83861, and instead contact the TearLab Reimbursement Support Center, under a Business Associate Agreement, Incentive Arrangements or SDAs indicating billing or payment problems should be sent to TearLab at the following HIPAA secure number - (833) 812-0540 - promptly upon receipt. TearLab will review the matter for you and determine the reason for denial and best method for resolve - [rsoc@tearlab.com](mailto:rsoc@tearlab.com)**

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## 5 STEPS TO DOCUMENT A LABORATORY TEST

Medicare has several documentation requirements for point-of-care laboratory tests such as tear osmolarity, which must be noted in the patient chart or Electronic Health Record (EHR). Together with your TearLab representative, please review your EHR or paper In-Site Form to ensure that all 5 points described here are being captured correctly.

**Remember: In an audit, if it is not documented properly and legibly it did not happen!**

- Note the sign or symptom of disease that prompted the ordering of the test.** For dry eye use one of the validated dry eye questionnaires (DEQ II, OSDI, or SPEED), design your own questionnaire, or utilize the Ocular Surface Health Questionnaire provided by TearLab. Dry eye signs or symptoms must be noted on the patient's record for that day. Ideally the symptom questionnaire can be attached or scanned into the EHR as further documentation. Signs or symptoms must be current complaints and not from a prior patient visit or history. A result code to monitor therapy for an "unstable condition" would be sufficient to justify a test, but that must also be documented in the chart, and the condition that is being monitored must indicate that the disease is still active and/or unstable.

TearLab testing can be performed anytime during the office visit if medical documentation exists showing the doctor had the result for the test to be performed, and that intent has been communicated by the doctor via a handwritten or electronic signature in the chart. See rules in 42 CFR 460 and Pub.900-52 chapter 15, §862.1.

A prior history of dry eye is not sufficient to justify a test. The patient must present with current signs or symptoms of disease, an unstable condition, or a vision fix by the masking of therapy, all of which must be properly documented.
- Specifically identify the test in the medical record by stating "tear osmolarity test was ordered".** Document the name of the test, i.e. "tear osmolarity" do not use acronyms (i.e. "TOT"). Although an order for a laboratory test is always required, Medicare regulations allow an order for an in-office laboratory test to be verbal and unsigned, as long as there is "medical documentation (e.g. progress notes) by the treating physician that he/she intended the clinical diagnostic test to be performed. This documentation showing the intent that the test be performed must be authenticated by the author via a handwritten or electronic signature." (see point #5).




Patients will not pay for the test if it is not used to manage the patient and identified by name (i.e. tear osmolarity) in the progress notes. Do not use abbreviations, i.e. "TOT".
- Record the numerical tear osmolarity test result and indicate if the results were "normal" or "abnormal".** It is not sufficient to just document the test results, you need to show that someone reviewed the test results to determine if they were "normal" or "abnormal", as per published reference values or your dry eye protocol. You must indicate that the laboratory test was used to manage the patient during that visit, and determine if the test results were normal or abnormal in clinical documentation. This can be a single check box in the chart, or a comment in the progress notes.

Return visits for therapeutic monitoring must have previous test results documented for comparison to current test results and support a change in the status of the patient's condition.
- Determine the Treatment/Management Plan, i.e. the medical action taken as a result of the tear osmolarity test, and reference the test results in the plan.** This is important, so payers will not pay for a test that is not used to manage the patient, as indicated in point #2. Even if the test results are "normal" that should be indicated in the progress notes, because it has about impact on the final diagnosis or management plan.


Laboratory tests will be covered if results are either "Normal" or "Abnormal". Either result must be used in the management of the patient, i.e. "Tear Osmolarity Normal, Dry Eye no longer considered, No Ocular Allergy".

Be sure that osmolarity testing is noted for the next follow-up appointment, if it's part of the management plan. This can be referenced for the day of the test.

\*Patient releasing per doctor selected orders for evaluation of the tear film, osmolarity findings, and related ocular evaluations secondary to ocular surface (always noted at least up 2 months ago)."
- Ensure the clinician signed the record indicating that everything in the chart that day was reviewed and confirmed as medically necessary.** As discussed in point #2, a verbal order is not sufficient for an in-office laboratory test, and the clinician's signature in the chart indicates the doctor's intent that the clinical diagnostic test be performed. If you are using a paper symptom questionnaire, the doctor's initials on the questionnaire provide additional documentation that the symptoms leading to the ordering of the test were properly reviewed.

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### PERCUTANEOUS TEST WITH ALLERGENIC EXTRACTS: CPT

A				B	C	D		E	F	G	H	I	J
Date(s) of Service				Place of Service	EMG	Procedures, Services, or Supplies (Explain Unusual Circumstances)		Diagnosis Pointer	\$ Charges	Day(s) or Units	Read y Plan	ID Qual	Rendering Provider ID.#
From	To												
M M	D D	YY	M M	D D	YY								
1	1	2018	1	1	2018	11	Day	99214 25	A	110.00	1	NP 1	XXXXXXXXXX
1	1	2018	1	1	2018	11	Day	95004	B	8.00	80	NP 1	XXXXXXXXXX

**AVERAGE MEDICARE REIMBURSEMENT:**

- \$3.60 - \$8.00 per unit


**THINGS YOU MUST KNOW:**

- Office visit is only billable if allergy testing was NOT the reason for their visit:
  - MUST use a 25 modifier on the OV (separate procedure / same day)
  - MUST use a unique diagnosis code for the allergy testing verses the OV
- MUST indicate the number of units / test spots (80 for Allerfocus)
- MUST order the procedure in the plan
- MUST have an Operative Note

**APPLICABLE DIAGNOSIS CODES:**

Allergic Conjunctivitis, bilateral	H10.13
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**Disclaimer: Rules and reimbursement will vary. Please review local regulations according to the carriers in your zip code.**



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**DAY EYE** CORRECTION OF TRICHIASIS; EPILATION, BY FORCEPS ONLY:  
CPT 67820

A Date(s) of Service						B	C	D	E	F	G	H	I	J		
From			To			Place of Service	EMG	Procedure, Service, or Supplies (Explain Unusual Circumstances)	CPT / HCPCS	Modifier	Diagnosis	5 Charges	Days of Units	Ready Plan	ID Qual	Rendering Provider ID #
MM	DD	YY	MM	DD	YY											
1	1	2018	1	1	2018	11	Day	99214	25		A,B	110.00	1		NPI	XXXXXXXXXX
1	1	2018	1	1	2018	11	Day	67820	E2		C	49.00	1		NPI	XXXXXXXXXX
1	1	2018	1	1	2018	11	Day	68720	S1	E4	D	49.00	1		NPI	XXXXXXXXXX

**AVERAGE MEDICARE REIMBURSEMENT:**

- \$18.34

**THINGS YOU MUST KNOW:**

- Office visit is only billable if epilation is NOT the reason for the visit.
  - MUST use a 25 modifier on OV (separate procedure / same day)
  - MUST have separate diagnosis code from office visit
- MUST use location modifiers: E1 (UL),E2 (LL),E3 (UR),E4 (LR). However, Medicare and some others are now paying PER EYE only, so use RT and LT instead
- MUST list each separately as 1 unit
- SOME payers require the use of -51 modifier (multiple procedures /same day) on additional lines
- MUST order the procedure in the plan
- MUST have an Operative Note

**APPLICABLE DIAGNOSIS CODES:**

TRICHIASIS WITHOUT ENTROPION	OD UL	H02.051
	OD LL	H02.052
	OS UL	H02.054
	OS LL	H02.055

**Disclaimer: Rules and reimbursement will vary. Please review local regulations according to the carriers in your zip code.**



**DAY EYE** PUNCTAL OCCLUSION: CPT 68761

A Date(s) of Service						B	C	D	E	F	G	H	I	J		
From			To			Place of Service	EMG	Procedure, Service, or Supplies (Explain Unusual Circumstances)	CPT / HCPCS	Modifier	Diagnosis	5 Charges	Days of Units	Ready Plan	ID Qual	Rendering Provider ID #
MM	DD	YY	MM	DD	YY											
1	1	2018	1	1	2018	11	Day	99214	25		A	110.00	1		NPI	XXXXXXXXXX
1	1	2018	1	1	2018	11	Day	68761	E2		B	144.00	1		NPI	XXXXXXXXXX
1	1	2018	1	1	2018	11	Day	68761	S1	E4	B	144.00	1		NPI	XXXXXXXXXX

**AVERAGE MEDICARE REIMBURSEMENT:**

- \$142.76, however reimbursement will only be 50% for any occlusion after the first

**THINGS YOU MUST KNOW:**


- Office visit is only billable if punctal occlusion was NOT the reason for their visit.
  - MUST use a 25 modifier on the OV (separate procedure / same day)
  - MUST use a unique diagnosis code for the punctal occlusion verses the OV
- SOME payers require a 51 modifier (multiple procedures/same day) on second line
- Must add location modifier: E1 (UL),E2 (LL),E3 (UR),E4 (LR)
- Bill the total amount for each line item, though reimbursement will be different for each line
- Includes a 10 day global period: do not bill an OV within 10 days, unless for a separate identifiable reason
- MUST order the procedure in the plan
- MUST have an Operative Note (see example)

**APPLICABLE DIAGNOSIS CODES:**

DRY EYE SYNDROME OF LACRIMAL GLAND	OU	H04.123		OD	H16.211
	OD	H04.121		OS	H16.212
	OS	H04.122	KERATOCONJUNCTIVITIS SICCA, NOT SPECIFIED AS SJOEGREN'S	OU	H16.223
UNSPECIFIED SUPERFICIAL KERATITIS	OU	H16.103		OD	H16.221
	OD	H16.101		OS	H16.222
	OS	H16.102	NEUROTROPHIC KERATOCONJUNCTIVITIS	OU	H16.233
FILAMENTARY KERATITIS	OU	H16.123		OD	H16.231
	OD	H16.121		OS	H16.232
	OS	H16.122	SICCA SYNDROME, UNSPECIFIED		M35.00
PUNCTATE KERATITIS	OU	H16.143	SICCA SYNDROME WITH KERATOCONJUNCTIVITIS		M35.01
	OD	H16.141			
	OS	H16.142			
EXPOSURE KERATOCONJUNCTIVITIS	OU	H16.213			

**Disclaimer: Rules and reimbursement will vary. Please review local regulations according to the carriers in your zip code.**





## Billing Guide for Punctal Occlusion

Lacrivera has created this guide to serve as an introduction to the billing procedures, requirements and codes relative to punctal occlusion.

### General Information

- All punctal occlusion is billed the same, regardless if permanent silicone plugs or temporary synthetic/collagen inserts are used.
- Allow a 10 day post-op period following the insertion of collagen plugs before inserting permanent plugs.
- When occluding more than one punctum at the same time, the first procedure is allowed at 100% and each additional procedure is allowed at 50%.

### Documentation

In addition to proper coding, be sure the procedure is properly and sufficiently documented.

- Document the patient's dry eye complaint. Be sure to note the patient's pertinent history, symptoms and affect on daily activities.
- Document unsuccessful alternative treatments. This should include the use of artificial tear supplements with continued dry eye symptoms.
- Document examination and evaluation of tear production to confirm Dry Eye Syndrome. This may include ZoneQuick, Schirmer, Rose Bengal Staining, and/or Tear Break-Up Time tests. Some tests may not be separately billable.
- Document that you have clearly explained to the patient the potential risks and benefits of punctal occlusion.

#### THE CODES TO KNOW

##### Primary Diagnosis Codes

**H04121** Dry Eye Syndrome of Right Lacrimal Gland  
**H04122** Dry Eye Syndrome of Left Lacrimal Gland  
**H04123** Dry Eye Syndrome of Distal Lacrimal Glands  
**H04129** Dry Eye Syndrome of Unspecified Gland

##### Secondary Diagnosis Codes

**H16.109** Unspecified superficial keratitis  
**H16.229** Keratoconjunctivitis sicca  
**H37.8** Redness or discharge  
**M35.01** Keratoconjunctivitis sicca associated with Sjogren's disease

##### CPT Procedure Code

**68761** Closure of the lacrimal punctum by plug, each

##### Supply Code

**A4283** HCPCS is 09970  
 Medicare combines the office visit, procedure and supply of collagen/silicone plugs. Thus they are not billed separately. Some private insurance companies may accept a separate supply code.

##### Punctum Identification


**E1** Upper lid, left  
**E2** Lower lid, left  
**E3** Upper lid, right  
**E4** Lower lid, right


##### Modifiers

**25** Separately identifiable service by the same doctor on the same day  
**51** Additional procedure

The information in this guide is believed to be accurate but is not intended to constitute an offer of insurance coverage. Coverage is subject to the actual policy terms, conditions, exclusions, limitations, and other provisions. Always refer to actual policy documents provided by Medicare and/or private insurance carriers.

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### REMOVAL OF CORNEAL EPITHELIUM; WITH OR WITHOUT CHEMOCAUTERIZATION (ABRASION, CURETTAGE): CPT 65435

A			B			C	D			E	F	G	H	I	J
Date(s) of Service			Place of Service			EMG	Procedure, Service, or Supplies (Explain Unusual Circumstances)			Diagnosis Pointer	\$ Charges	Days or Units	Ready Plan	ID Qual	Rendering Provider ID#
MM	DD	YY	MM	DD	YY		CPT / HCPCS	Modifier							
1	1	2018	1	1	2018	11	Day	99214	25		A,B	110.00	1		NPI XXXXXXXX
1	1	2018	1	1	2018	11	Day	65435	RT		C	79.00	1		NPI XXXXXXXX

**AVERAGE MEDICARE REIMBURSEMENT:**

- \$80.55


**THINGS YOU MUST KNOW:**

- Office visit is only billable if debridement is NOT the reason for the visit.
  - MUST use a 25 modifier on OV (separate procedure / same day)
  - MUST have separate diagnosis code from office visit
- MUST use location modifier: RT or LT
- 0 day global period: ok to bill any subsequent OV as necessary
- MUST order the procedure in the plan
- MUST have an Operative Note

**APPLICABLE DIAGNOSIS CODES:**

FILAMENTARY KERATITIS, BILATERAL	OU	H16.123
	OD	H16.121
	OS	H16.122

**Disclaimer: Rules and reimbursement will vary. Please review local regulations according to the carriers in your zip code.**



**DRIVE EYE** PLACEMENT OF AMNIOTIC MEMBRANE ON THE OCULAR SURFACE; WITHOUT SUTURES (PROKERA); CPT 65778

A		B		C		D		E		F		G		H		I		J					
Date(s) of Service		From		To		Procedure, Service, or Supply (Include Unusual Circumstances)		Place of Service		EMG		CPT/HCPCS		Modifier		Diagnosis		ICD-9		ICD-10			
MM	DD	YY	MM	DD	YY	MM	DD	YY	MM	DD	YY	MM	DD	YY	MM	DD	YY	MM	DD	YY	MM	DD	YY
1	1	2018	1	1	2018	11	Day	99214	25			A,B	110.00	1			NPI	XXXXXXXX					
1	1	2018	1	1	2018	11	Day	65778	RT			C	1500.0	1			NPI	XXXXXXXX					

**MEDICARE EXAMPLE**

A		B		C		D		E		F		G		H		I		J					
Date(s) of Service		From		To		Procedure, Service, or Supply (Include Unusual Circumstances)		Place of Service		EMG		CPT/HCPCS		Modifier		Diagnosis		ICD-9		ICD-10			
MM	DD	YY	MM	DD	YY	MM	DD	YY	MM	DD	YY	MM	DD	YY	MM	DD	YY	MM	DD	YY	MM	DD	YY
1	1	2018	1	1	2018	11	Day	99214	25			A,B	110.00	1			NPI	XXXXXXXX					
1	1	2018	1	1	2018	11	Day	65778	RT			C	1500.0	1			NPI	XXXXXXXX					
1	1	2018	1	1	2018	11	Day	V2790	RT			C	500.00	1			NPI	XXXXXXXX					

**COMMERCIAL PAYER EXAMPLE**

**AVERAGE MEDICARE REIMBURSEMENT:**

- \$1,068 - \$1,523

**THINGS YOU MUST KNOW:**

- 0 day global period; Subsequent visits can be billed independently of the procedure

- Prokera fee includes an office visit for insertion. It would be a very RARE occasion to bill an OV on this day, and only if there is a separate identifiable reason. In this case, you MUST add a 25 modifier on the OV
- Some commercial insurances may reimburse supply code, V-2790. This is rare, but worth submitting initially.
- Strongly advised that you call all commercial payers beforehand to confirm that no Prior Authorization is needed and to confirm if Prokera will be applied to their deductible. No one wants a surprise.
- Must order the procedure in the plan
- Must have an Operative Note (see example)
- It is wise to have Prokera on hand in order to respond immediately to unexpected epithelial disruption

**APPLICABLE DIAGNOSIS CODES:**

ICD-9	ICD-10	ICD-10
540.00	U05.011	OTHER SPECIFIED DISORDERS OF CORNEA
540.01	H16.223	KERATOCONJUNCTIVITIS SICCA, NOT SPECIFIED AS SJOEGREN'S
540.02	H16.221	EXPOSURE KERATOCONJUNCTIVITIS
540.03	H16.211	PUNCTATE KERATITIS
540.04	H16.141	FILAMENTARY KERATITIS
540.05	H16.231	NEUTROPHILIC KERATOCONJUNCTIVITIS
540.06	H16.232	RECURRENT EROSION OF CORNEA
540.07	H16.001	UNSPECIFIED CORNEAL ULCER
540.08	H16.002	CENTRAL CORNEAL ULCER
540.09	H16.003	OTHER HEREDITARY CORNEAL DYSTROPHIES
540.10	H16.004	HERPESVIRAL KERATITIS
540.11	H16.005	OTHER DISORDERS OF SCLERA
540.12	H16.006	SCLEROSING KERATITIS
540.13	H16.331	PANNUS (CORNEAL)
540.14	H16.421	BAND KERATOPATHY
540.15	H16.422	NODULAR CORNEAL DEGENERATION
540.16	H16.423	OTHER HEREDITARY CORNEAL DYSTROPHIES
540.17	H16.424	HERPESVIRAL KERATITIS
540.18	H16.425	OTHER DISORDERS OF SCLERA

\*These are general guidelines however local carriers will vary (Ex: BCBS in FL and AL will not reimburse if billed with H16.143/H16.141/H16.142/H16.149)  
 \*Use caution when billing BCBS. In some states BCBS will only reimburse if the membrane is stitched in place. This is new! In this case, collect from the patient on the day of service.

**Disclaimer: Rules and reimbursement will vary. Please review local regulations according to the carriers in your zip code.**



**Why Intervene?**

Disease Category	Clinical Picture	Indications	ICD-9 Codes	Clinical Question
Dry Eye		Severe Dryness	540.00	Use only along with treating the underlying cause & is contraindicated for infectious ocular cases.
		Corneal Epithelial Defects	540.01	
		Refractive Corneal Abnormalities	540.02	
		Refractive Corneal Abnormalities	540.03	
Dry Eye		Refractive Corneal Abnormalities	540.04	Failure of standard therapy justifies a controlled use of Prokera®.
		Refractive Corneal Abnormalities	540.05	
		Refractive Corneal Abnormalities	540.06	
Dry Eye		Refractive Corneal Abnormalities	540.07	Use after discontinuation of superficial keratectomy or reepithelialization.
		Refractive Corneal Abnormalities	540.08	
Dry Eye		Refractive Corneal Abnormalities	540.09	Use after superficial keratectomy.
		Refractive Corneal Abnormalities	540.10	
Dry Eye		Refractive Corneal Abnormalities	540.11	Use after superficial keratectomy.
		Refractive Corneal Abnormalities	540.12	
Dry Eye		Refractive Corneal Abnormalities	540.13	Use immediately for corneal treatment.
		Refractive Corneal Abnormalities	540.14	
Dry Eye		Refractive Corneal Abnormalities	540.15	Multiple use may be required.
		Refractive Corneal Abnormalities	540.16	

**REFERENCES**

1. Parkgins G, Pevsner D, Chhabra RK, Sridhar A, and Kelly JI, Multiple Use Evaluation of the Use of Prokera in the Management of ocular surface ocular diseases. Eye Contact Lens. 2018;46(1):1-15.
2. Bal H, Juvon V, Patel M, et al. Multisession amniotic membrane Prokera for corneal epithelial disorders. Invest Ophthalmol Vis Sci. 2018;59(12):4617-4621.
3. Wang H, Liang L, Li C, Tang H, et al. Multisession amniotic membrane transplantation for severe keratoconjunctivitis. Cornea. 2018;37(1):118-123.
4. Shwa S, Ng H, Cheng AK, Tang H, et al. Amniotic Membrane Transplantation for Epithelial Defects. J Ocul Dis. 2018;2018:1-10.
5. Shwa S, and Tang H, et al. Amniotic Membrane Transplantation for Epithelial Defects. J Ocul Dis. 2018;2018:1-10.
6. Shwa S, Tang H, et al. The role of amniotic membrane in managing dry eye disease. In: Shwa S, Tang H, et al. (eds) Dry Eye Disease. 2018, pp. 101-110. Elsevier; 2018.
7. Shwa S, Tang H, et al. Multisession amniotic membrane for severe dry eye disease. JAMA Ophthalmol. 2018;36(10):1181-1186.
8. Tang H, Shwa S, et al. The role of amniotic membrane in the management of ocular surface disease. In: Tang H, Shwa S, et al. (eds) Dry Eye Disease. 2018, pp. 101-110. Elsevier; 2018.
9. Tang H, Shwa S, et al. Amniotic membrane transplantation for severe dry eye disease. JAMA Ophthalmol. 2018;36(10):1181-1186.
10. Shwa S, Tang H, et al. Amniotic membrane transplantation for severe dry eye disease. JAMA Ophthalmol. 2018;36(10):1181-1186.
11. Shwa S, Tang H, et al. Amniotic membrane transplantation for severe dry eye disease. JAMA Ophthalmol. 2018;36(10):1181-1186.
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15. Shwa S, Tang H, et al. Amniotic membrane transplantation for severe dry eye disease. JAMA Ophthalmol. 2018;36(10):1181-1186.
16. Shwa S, Tang H, et al. Amniotic membrane transplantation for severe dry eye disease. JAMA Ophthalmol. 2018;36(10):1181-1186.
17. Shwa S, Tang H, et al. Amniotic membrane transplantation for severe dry eye disease. JAMA Ophthalmol. 2018;36(10):1181-1186.

**Special Instructions:**

- 1) This is a controlled use of Prokera.
- 2) Prokera is contraindicated for infectious ocular diseases.
- 3) Multiple use may be required for severe dry eye disease.





**Thermal Evacuation**

A		B		C	D	E	F	G	H	I	J			
Date(s) of Service		From		To	Place of Service	EMG	CPT / HCPCS	Modifier	Diagnosis Pointer	S Charges	Days or Units	Read y Plan	ID Qual	Rendering Provider ID #
M	M	DD	YY	MM	DD	YY								
1	1	2018	1	1	2018	11	Day	0270T			1500.0	1		NPI xxxxxxxx x

**AVERAGE MEDICARE and PRIVATE PAYER REIMBURSEMENT:**

• \$0-???

**THINGS YOU MUST KNOW:**

- Currently no CPT code and not typically covered by any insurance ( Check with your local insurance carrier as insurance claims may be required in your state)
- Though it is rare, there are carriers willing to pay small amounts. Be sure to get an ABN signed!
- Some patients desire to submit for reimbursement themselves. Provide patient with itemized bill/receipt. If you must, 0270T is the closest applicable code
- Patients will often ask for a letter of necessity, as requested by their carrier (see example)
- There is often a small patient rebate from Tear Science

**APPLICABLE DIAGNOSIS CODES:**

UNSPECIFIED BLEPHARITIS	OD UL	H01.001
	OD LL	H01.002
	OS UL	H01.003
	OS LL	H01.004
MEIBOMIAN GLAND DYSFUNCTION	OD UL	H02.881
	OD LL	H02.882
(unspecified lid)	OD	H02.883
	OS UL	H02.884
	OS LL	H02.885
(unspecified lid)	OS	H02.886
(unspecified eye / unspecified lid)		H02.889
	OD UL/LL	H02.88A
	OS UL/LL	H02.88B

**Disclaimer: Rules and reimbursement will vary. Please review local regulations according to insurance carriers in your zip code.**

**C. Identification Number:**

**A. Notifier:** \_\_\_\_\_  
**B. Patient Name:** \_\_\_\_\_

**Advance Beneficiary Notice of Non-coverage (ABN)**

**NOTE: If Medicare doesn't pay for D** below, you may have to pay. Medicare does not pay for everything, even some care that you or your health care provider have good reason to think you need. We expect Medicare may not pay for the D. below.

**D.** \_\_\_\_\_ **E. Reason Medicare May Not Pay:** \_\_\_\_\_ **F. Estimated Cost:** \_\_\_\_\_

**WHAT YOU NEED TO DO NOW:** do you can make an informed decision about your care. Read this notice, do you can make an informed decision about your care. listed above.  
 • Ask us any questions that you may have after you finish reading. listed above.  
 • Choose an option below about whether to receive the D. listed above.  
 • Note: if you choose Option 1 or 2, we may help you to use any other insurance that you might have, but Medicare cannot require us to do this.

**G. OPTIONS: Check only one box. We cannot choose a box for you.**

**OPTION 1.** I want the D. listed above. You may ask to be paid now, but I also want Medicare billed for an official decision on payment, which is sent to me on a Medicare Summary Notice (MSN). I understand that if Medicare doesn't pay, I am responsible for payment, but I can appeal to Medicare by following the directions on the MSN. If Medicare does pay, you will refund any payment I made to you, less co-pay or deductibles.

**OPTION 2.** I want the D. listed above, but do not bill Medicare. You may ask to be paid now as I am responsible for payment. I cannot appeal if Medicare is not billed.

**OPTION 3.** I don't want the D. listed above. I understand with this choice I am not responsible for payment, and I cannot appeal to see if Medicare would pay.

**H. Additional information:**

This notice gives our opinion, not an official Medicare decision. If you have other questions on the notice or Medicare billing, call 1-800-MEDICARE (1-800-633-6222/TTY: 1-877-486-2048). Signing below means that you have received and understand this notice. You may ask to receive a copy.

**I. Signature:** \_\_\_\_\_ **J. Date:** \_\_\_\_\_

You have the right to get Medicare information in an accessible format, like large print, Braille, or audio. You also have the right to file a complaint if you feel you've been discriminated against. Visit Medicare.gov/about-us/accessibility for more information.

According to the Privacy Rule, you have the right to request a copy of this notice in an accessible format. If you need this notice in an accessible format, please contact us at 1-800-MEDICARE (1-800-633-6222) or TTY: 1-877-486-2048. We will provide this notice in an accessible format as soon as possible, but no later than 30 days after we receive your request. If you need this notice in an accessible format, please contact us at 1-800-MEDICARE (1-800-633-6222) or TTY: 1-877-486-2048.

Form CMS-R-131 (Exp 01/31/2025) Form Approved OMB No. 0938-0066



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**IPL: INTENSE PULSE LIGHT**

A		B		C	D	E	F	G	H	I	J			
Date(s) of Service		From		To	Place of Service	EMG	CPT / HCPCS	Modifier	Diagnosis Pointer	S Charges	Days or Units	Read y Plan	ID Qual	Rendering Provider ID #
M	M	DD	YY	MM	DD	YY								
1	1	2018	1	1	2018	11	Day	17999			1600	1		NPI xxxxxxxx x

**AVERAGE MEDICARE and PRIVATE PAYER REIMBURSEMENT:**

• \$0

**THINGS YOU MUST KNOW:**

- Currently no CPT code and not typically covered by any insurance
- Some patients desire to submit for reimbursement themselves. Provide patient with itemized bill/receipt. If you must, 17999 is the closest applicable code
- Patients will often ask for a letter of necessity, as requested by their carrier

**APPLICABLE DIAGNOSIS CODES:**

Rosacea Conjunctivitis, bilateral		H10.823
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**Disclaimer: Rules and reimbursement will vary. Please review local regulations according to the carriers in your zip code.**



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# out-of-pocket considerations

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**“I’m on a budget  
...where do I begin?”**



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## How long does it take to pay for the average diagnostic instrument?

Assuming ~\$25K

At \$99/dry eye eval and 1/week



\$20/ext photos on 6 patients/day



Paid in full in ~8 months

At \$99/dry eye eval and 2/week



\$20/ext photos on 10 patients/day

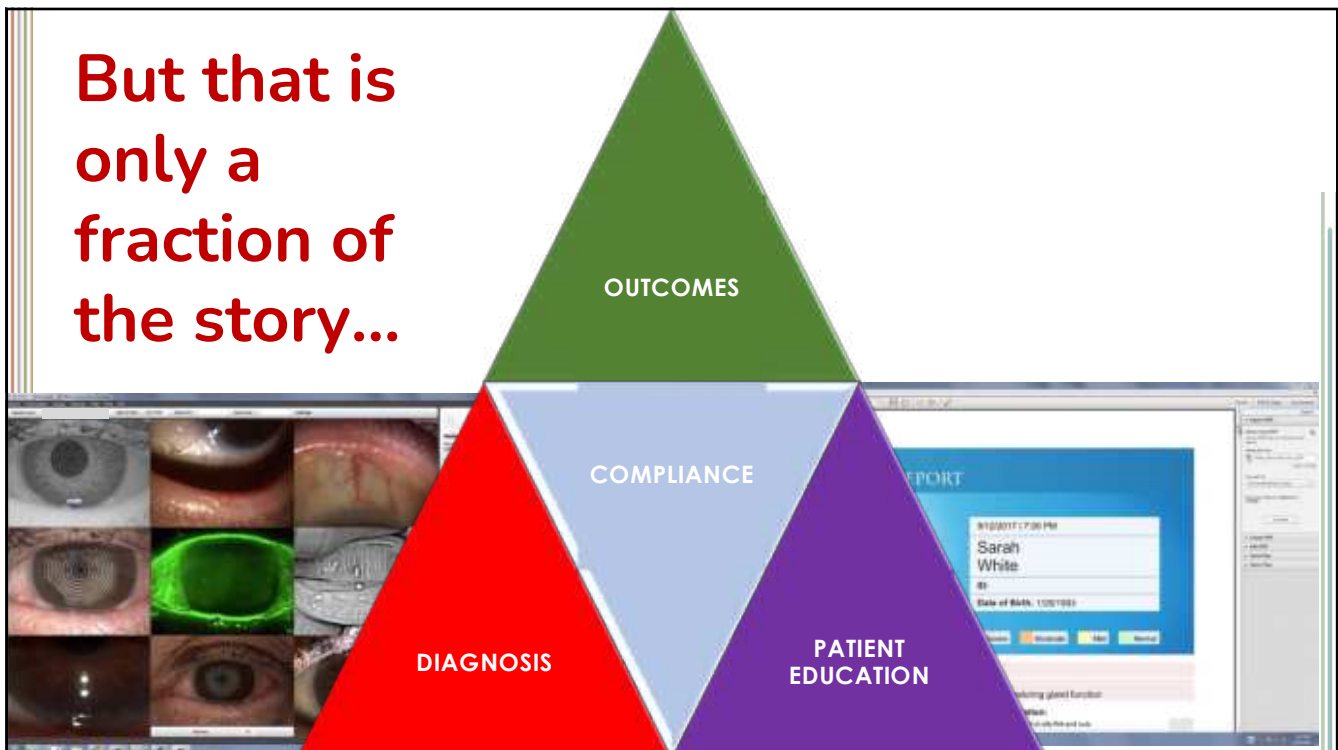


Paid in full in < 4 months



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But that is only a fraction of the story...



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## POTENTIAL ROI: VISIT #1

- OFFICE VISIT (99205): \$216.77
- OSMO: \$22.48 X 2
- INFLAMMADRY: \$14.24 X 2
- EXTERNAL PHOTOS: \$22.92
- DRY EYE EVAL (OOP FOR 5M): \$99
- PLUS TOPO (IF WARRANTED): \$35.69
- TOTAL FEES COLLECTED: **\$447.82**
- WARM COMPRESS MASK: \$80 (-40)
- OMEGA 3: \$108 (-45)
- LID SCRUB: \$18 (-9)
- Hypochlorous acid: \$38 (-18)
- SLEEP MASK: \$60 (-30)
- TOTAL POTENTIAL PURCHASES: **\$304**
- **NET = \$162**

• **TOTAL NET = \$609.82**



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### Mild:

## Potential Annual revenue per patient

- **3 visits / year** : \$431  
(DEE + 99205, 99214, 99213 )
- 6 month Plugs: \$217 x 2 = \$434  
(-60)
- Osmolarity at each visit: \$135  
(-60)
- Inflammadry at each visit: \$90  
(-48)
- External photos at each visit: \$66
- Omega 3: \$648 (-270)
- Tranquileyes W/C Mask: \$80 (-40)
- Lid scrubs X 9: \$108 (-54)
- Pure & Clean x 10: \$380 (-180)
- **In office lid exfoliation: \$200**
- **In office expression with Eye Cloud x 2: \$100**

TOTAL COLLECTED = \$2,771  
MINUS COGS ~\$712

**NET ~ \$2,059**  
**@1/WEEK = \$107,068**

\*Treatment equipment  
investment: ~\$300



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## Moderate: Potential Annual revenue per patient

- 5 visits / year : \$646 (DEE + 99205, 99214, 99214, 99213, 99213)
- 6 month Plugs: \$217 x 2 = \$434 (-60)
- Osmolarity at each visit: \$225 (-100)
- Inflammadry at each visit: \$150 (-80)
- External photos at each visit: \$110
- Omega 3: \$648 (-270)
- Tranquileyes W/C Mask: \$80 (-40)
- Pure & Clean
- NuLids: \$309 (-\$189) + \$360 (-\$252)
- Eye Wash x 6: \$36 (-15)
- Sleep mask: \$60 (-30)
- IPL: \$1800

TOTAL COLLECTED = \$5,337  
 MINUS COGS ~\$1,216  
**NET ~ \$4,121**  
**@1/WEEK = \$214,292**



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## Severe: Potential Annual revenue per patient

- 8 visits / year : \$1061 (DEE + 99205, 99214 x 6, 99213)
- 6 month Plugs: \$217 x 2 = \$434 (-60)
- Osmolarity at each visit: \$360 (-160)
- Inflammadry at each visit: \$240 (-128)
- External photos at each visit: \$176
- Topography: \$35
- Omega 3: \$648 (-270)
- Omega 6: \$456 (-324)
- Tranquileyes W/C Mask: \$80 (-40)
- Pure and Clean x
- Cliradex Light x 3: \$90(-45)
- NuLids: \$309 (-\$189) + \$360 (-\$252)
- Eye wash x 20: \$120 (-50)
- Sleep mask: \$60 (-30)
- PM Tear gel x 8: \$160(-80)
- IPL: \$1800
- Amniotic membrane x 2 = \$2700 (-1300)
- Thermal evacuation: \$1000 (-260)

TOTAL COLLECTED = \$10,568  
 MINUS COGS ~\$3,368  
**NET ~ \$7,200**  
**@2/MONTH = \$172,800**



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## Very Severe: Potential Annual revenue per patient

- 10 visits / year : \$ 1,150 (DEE + 99205, 99214 x 6, 99213 X 2)
- 6 month Plugs: \$217 x 2 = \$434 (-60)
- Osmolarity at each visit: \$450 (-200)
- Inflammadry at each visit: \$300 (-160)
- External photos at each visit: \$220
- Topography: \$35
- Omega 3: \$648 (-270)
- Omega 6: \$456 (-324)
- Tranquileyes W/C Mask: \$80 (-40)
- Pure and Clean x 10: \$380 (-180)
- NuLids: \$309 (-\$189) + \$360 (-\$252)
- Eye wash x 20: \$120 (-50)
- Sleep mask: \$60 (-30)
- PM Tear gel x 8: \$160(-80)
- Cliradex Light x 3: \$90(-45)
- IPL: \$1800
- Amniotic membrane x 2 = \$2700 (-1300)
- Thermal evacuation : \$1000 (-260)
- Scleral lens fit: \$3000 (-340)

TOTAL COLLECTED = \$13,851  
 MINUS COGS ~\$3,780  
**NET ~ \$10,071**  
**@2 /MONTH = \$241,704**

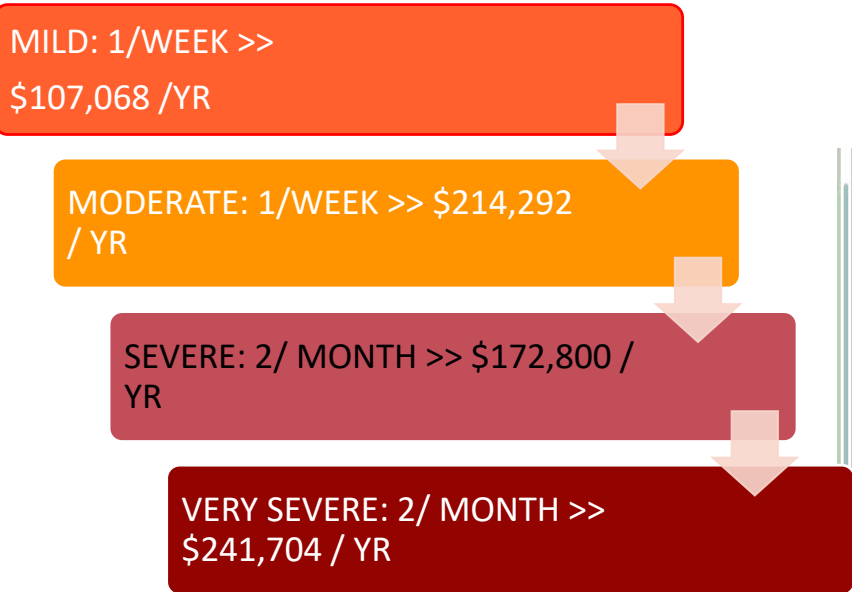


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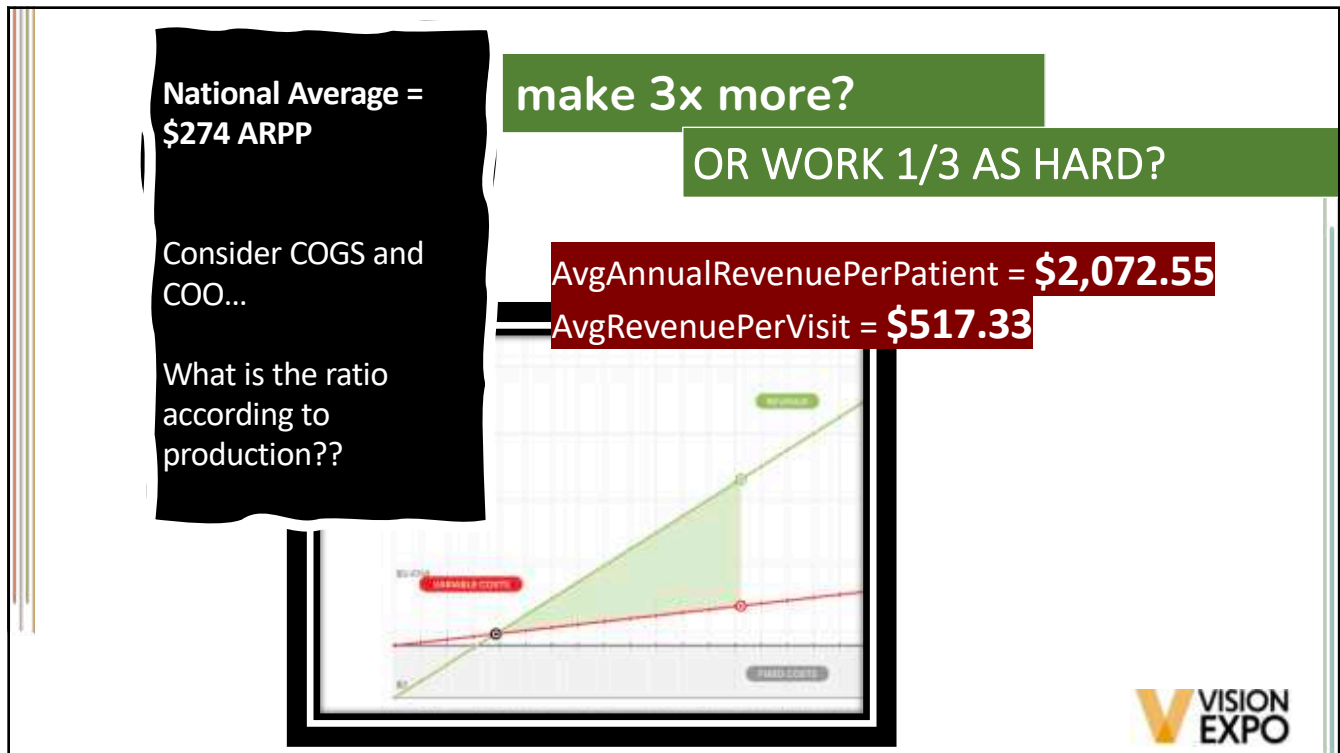
**4 DRY EYE PATIENTS PER WEEK**

**= \$735,864**

**ADDITIONAL ANNUAL REVENUE**



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# How do I know what to buy???

Follow these 4 guidelines and ...you will know.

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caveat:

MUST BE IN THIS ORDER

## 1. efficacy

If it works...IT WILL PAY FOR ITSELF!

If it doesn't...DON'T GET IT, EVEN IF IT'S FREE!



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## 2. experience

What is the patient's perception... on COMFORT?

on VALUE?



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To compare apples to apples, consider...

### 3. business model

Cost of device

Cost of applicators

Profit margin per treatment

Conversion rate considering value and MSRP

Repeat interval

...over 3 years



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### 4. the people

warrantee

training

resources

support

reputation

marketing



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