INTRODUCTION

Medtronic FocusOn Monitoring Service (the service) is a virtual extension of your clinical team provided by Medtronic Monitoring Inc. (MMI), which is a wholly owned subsidiary of Medtronic. MMI is a Medicare-certified independent diagnostic testing facility (IDTF) which has met a set of performance standards in order to obtain and maintain Medicare billing privileges. Please reference 42 C.F.R. section 410.33(g) for details on these standards. The service helps you streamline patient management and cardiac data review for patients with a Reveal LINQ™ insertable cardiac monitor (ICM). Medtronic FocusOn Monitoring Service is the program name for the work of performing remote monitoring technical services of the Reveal LINQ ICM.

Medtronic provides this information for your convenience only. It does not constitute legal advice or a recommendation regarding clinical practice. Information provided is gathered from third-party sources and is subject to change without notice due to frequently changing laws, rules, and regulations. The provider has the responsibility to determine medical necessity and to submit appropriate codes and charges for care provided. Medtronic makes no guarantee that the use of this information will prevent differences of opinion or disputes with Medicare or other payers as to the correct form of billing or the amount that will be paid to providers of service. Please contact your Medicare contractor, other payers, reimbursement specialists, and/or legal counsel for interpretation of coding, coverage, and payment policies. This document provides assistance for FDA-approved or cleared indications. Where reimbursement is sought for use of a product that may be inconsistent with, or not expressly specified in, the FDA-cleared or approved labeling (e.g., instructions for use, operator’s manual, or package insert), consult with your billing advisors or payers on handling such billing issues. Some payers may have policies that make it inappropriate to submit claims for such items or related service.

BILLING

1. How does Medtronic FocusOn Monitoring Service work?
For patients with a Reveal LINQ ICM who are enrolled in the service, cardiac technicians perform the technical remote monitoring work described by CPT® 93299, which specifies "interrogation device evaluation(s), (remote) up to 30 days; implantable cardiovascular physiologic monitor system or subcutaneous cardiac rhythm monitor system."

The service charges your clinic directly for the technical remote monitoring work for patients enrolled in the service. MMI is the legal entity that is the performing provider and that will send invoices for the service.

2. How will our clinic receive a bill from Medtronic FocusOn Monitoring Service for patients enrolled in the service?
The service will create an invoice listing all of your patients who were monitored, and will provide the list to the clinic in the form of a monthly bill.

3. Can our clinic submit claims for CPT 93299 regarding patients enrolled in Medtronic FocusOn Monitoring Service?
For Medicare beneficiaries, Medicare allows technical and/or professional diagnostic services to be ordered by a physician and performed by a third party, subject to the anti-markup rule. Therefore, Medicare will accept claims from patients enrolled in the service.

Medicare Advantage plans follow their own claim processing instructions. We recommend contacting your Medicare Advantage plan directly to determine their individual policies and procedures.

For private payer beneficiaries, private payer claims submission and billing policies vary by plan; we recommend contacting your contracted private payers directly to determine their individual policies and procedures.
4. What is the anti-markup rule? The anti-markup rule limits the price for diagnostic services (technical and/or professional) that are ordered by a physician and performed by a third party. Under the anti-markup rule, CMS is required to enforce payment restrictions on diagnostic tests where the provider performing or supervising the test does not share a practice with the billing provider. This prevents a practice from making profits from diagnostic tests when diagnostic services were not performed, supervised, or interpreted by the ordering physician. Medicare requires the billing provider to bill the lowest of the following amounts for diagnostic tests:
   a. The performing provider’s net charge (minus the cost of equipment or leased space) to the billing physician or provider;
   b. The billing provider or provider’s actual charge; or
   c. The fee schedule amount of the diagnostic test that would be permitted if the performing provider billed Medicare directly. (The 2019 payment rate for CPT 93299 if MMI billed Medicare directly is $176.91.)

5. How does the anti-markup rule affect my clinic when participating in Medtronic FocusOn℠ Monitoring Service?
   For patients enrolled in the service, MMI is the performing provider for the technical service and your clinic is the billing provider of the work described by CPT 93299. Medtronic FocusOn℠ Monitoring Service is the program name. MMI is the entity that has obtained a national provider identification (NPI) number and received certification from CMS as an independent diagnostic testing facility (IDTF).
   We suggest following the anti-markup rules listed above to stay compliant with CMS enforced payment restrictions. We recommend speaking with your compliance department with questions or concerns regarding the anti-markup rule.

6. How do I submit claims for the patients enrolled in Medtronic FocusOn℠ Monitoring Service?
   You will need to submit two separate claims — one to indicate that MMI performed the technical remote monitoring work (CPT 93299), and another to indicate your clinic performed the professional remote monitoring work (CPT 93298).

7. How do I indicate that the work was performed by MMI?
   You will list MMI as the provider that performed the technical remote monitoring work (CPT 93299) using MMI’s national provider identifier (NPI) and address on the CMS-1500 claim form.
   MMI is the legal entity name that will need to be listed on the billing providers’ CMS Form 1500 as the provider who provided the remote monitoring technical services. Medtronic FocusOn℠ Monitoring Service will not be known to CMS if Medtronic FocusOn℠ Monitoring Service is identified on the CMS form 1500. The name, address, and ZIP code should be reported in Item 32 of the CMS-1500 claim, or in the corresponding loop and segment of the electronic claim form. The NPI of the provider who performed the service should be reported in Item 32a of the CMS-1500 claim form or in the corresponding loop and segment of the electronic claim form.

8. What is the address and NPI for MMI?
   NPI: 1558845628
   Address: Medtronic Monitoring Inc.
   800 53rd Avenue NE
   Columbia Heights, MN 55421

If you have additional questions, please visit our website at www.medtronic.com/CRHFreimbursement or contact the Medtronic Cardiac Rhythm and Monitoring Reimbursement Support Team by phone at 866-877-4102 Monday–Friday from 8 a.m.–5 p.m. CT, or by email (one business day turnaround) at rs.healthcareeconomics@medtronic.com.

If you have questions regarding the invoice you have received from MMI or regarding the service provided by MMI, please contact MMI at 877-247-7449.
Brief Statement
Reveal LINQ™ Insertable Cardiac Monitor

Indications
The Reveal LINQ insertable cardiac monitor is an implantable patient-activated and automatically activated monitoring system that records subcutaneous ECG and is indicated in the following cases:

- Patients with clinical syndromes or situations at increased risk of cardiac arrhythmias
- Patients who experience transient symptoms such as dizziness, palpitation, syncope, and chest pain, that may suggest a cardiac arrhythmia

This device has not been specifically tested for pediatric use.

Contraindications
There are no known contraindications for the implant of the Reveal LINQ insertable cardiac monitor. However, the patient’s particular medical condition may dictate whether or not a subcutaneous, chronically implanted device can be tolerated.

Warnings/Precautions
Patients with the Reveal LINQ insertable cardiac monitor should avoid sources of diathermy, high sources of radiation, electrosurgical cautery, external defibrillation, lithotripsy, therapeutic ultrasound, and radiofrequency ablation to avoid electrical reset of the device, and/or inappropriate sensing as described in the medical procedure and EMI precautions manual. MRI scans should be performed only in a specified MR environment under specified conditions as described in the Reveal LINQ MRI Technical Manual.

Potential Complications
Potential complications include, but are not limited to, device rejection phenomena (including local tissue reaction), device migration, infection, and erosion through the skin.

See the device manuals for detailed information regarding the implant procedure, indications, contraindications, warnings, precautions, and potential complications/adverse events. For further information, please call Medtronic at 1-800-328-2518 and/or consult the Medtronic website at medtronic.com.

Caution: Federal law (USA) restricts this device to sale by or on the order of a physician.

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