Work Instruction - Coverage Analysis for Clinical Research Studies

Velos eResearch
Version 9.2

Version: 2.0, 04/03/2015
Revision History

<table>
<thead>
<tr>
<th>Version/Amendment #:</th>
<th>Version Date:</th>
<th>Description:</th>
<th>Completed By:</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.1</td>
<td>9/25/14</td>
<td>Initial Draft Document</td>
<td>Pamela Sabrsula</td>
</tr>
<tr>
<td>0.2</td>
<td>10/06/14</td>
<td>Peer Review</td>
<td>Lissa Persson</td>
</tr>
<tr>
<td>1.0</td>
<td>10/27/14</td>
<td>Final</td>
<td>Pamela Sabrsula</td>
</tr>
<tr>
<td>1.1</td>
<td>3/24/15</td>
<td>Peer Review by CTRC</td>
<td>Kim Markosfeld</td>
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<tr>
<td>2.0</td>
<td>4/03/15</td>
<td>Final</td>
<td>Pamela Sabrsula</td>
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</table>

Documentation of Change History:


Version 0.2, 10/06/2014: Peer review; minor updates

Version 1.0, 10/27/2014: Add RACI chart, minor updates, finalize document

Version 1.1, 03/24/2015: Peer review comments from CTRC

Version 2.0, 04/03/2015: Finalize document
PURPOSE

The purpose of this work instruction is to describe the instructions for completing the billing grid as part of the Coverage Analysis tab in Velos eResearch for those studies that are entered into the system per the Standard Operating Procedure for Coverage Analysis (SOP-005_CoverageAnalysis.docx). This is a continuation of the Billing Risk Review. Refer to the latest revision of the following documents which cover the Billing Risk Review process:

<table>
<thead>
<tr>
<th>Description</th>
<th>Document</th>
</tr>
</thead>
<tbody>
<tr>
<td>Work Instruction</td>
<td>Velos Work Instruction – Research Billing Risk.docx</td>
</tr>
<tr>
<td>Standard Operating Procedure</td>
<td>SOP-004_ResearchBilling Risk.docx</td>
</tr>
</tbody>
</table>

RESPONSIBILITY

**Clinical Trials Office Staff** - Designated CTO staff are responsible for performing the coverage analysis by reviewing human subject research studies that have a patient billing risk to ascertain the appropriate payer for services provided as part of the clinical research study. The following responsibilities also apply:

- CTRC CTO – provide coverage analysis support for all cancer-related studies. Submit the coverage analysis results to VPR CTO.
- VPR CTO – provide coverage analysis support for all studies that are not cancer-related. Submit coverage analysis results for cancer and non-cancer studies to the Office of Clinical Research (OCR) as part of the Institutional Review.

**Research Team (RT)** – Provide relevant documents and study information as requested by CTO staff. Communicate patient activity, services provided, and billing instructions to the appropriate billing entities.

**Principal Investigator (PI)** – Review completed coverage analysis for accuracy and to confirm agreement.

ENTRY/PREREQUISITE CRITERIA

Prior to starting the Coverage Analysis in eResearch, the following must be completed:

- Billing Risk Questionnaire (BRQ) to help direct the coverage types and billing instructions
- Calendar of the study schedule of events/assessments must be completed in eResearch.

If not completed, refer to the latest revision of the Velos Work Instruction - Study Setup.docx for instructions on completing a calendar.

RELEVANT DOCUMENTS

The following documentation (as applicable) is referenced while completing the Coverage Analysis within eResearch. Note that the finalized version of various documents (*) must be received before the Coverage Analysis can be completely finalized.

- Completed Billing Risk Questionnaire form (BRQ). (Refer to Velos Work Instruction – Research Billing Risk.docx for instructions on completing the form in eResearch).
- Research Protocol*
### WORK INSTRUCTIONS

<table>
<thead>
<tr>
<th>Role/Function</th>
<th>Description of Action</th>
</tr>
</thead>
</table>
| **Coverage Analyst** | Navigate to Study Summary  
1. Log-in to eResearch  
2. Click the MANAGE button from the toolbar and select SEARCH under the STUDIES option  
3. From the list of studies that appear, locate the desired study and CLICK the Clipboard icon for quick access to the Study >> Summary Page  
**NOTE**: Enter the study number in the “Search a Study” text field, then click SEARCH to quickly locate the desired study. |
| **Coverage Analyst** | Navigate to the Coverage Analysis Tab  
1. From the Study Summary tab, CLICK the Study Setup tab  
2. LOCATE the Calendar to be used for the Coverage Analysis and CLICK on the Calendar Name  
3. The Calendar selected will open to the Event-Visit Grid tab.  
4. CLICK on the Coverage Analysis tab to view the schedule below. |

**Version 2.0, 04/03/2015**

**University of Texas Health Science Center at San Antonio**

**Clinical Trials Office**
1. USE the determinations from the Billing Risk Questionnaire and the funding agreement (contract/grant) to assign the appropriate Coverage Types to each Event on the Calendar.
   a. Refer to SOP-005_CoverageAnalysis for guidance on performing a Coverage Analysis.

2. HIGHLIGHT the Event row and CLICK to open the Edit Coverage Analysis for Event window.
   a. REPEAT this step for each EVENT listed on the Calendar.

Refer to the screenshot below for the following steps

3. VERIFY that Coverage Types are being assigned for the correct Event [A].
4. IF the Coverage Types are the SAME for that Event for each Visit, SELECT the Coverage Type under Apply to All Visits [B].
5. IF the Coverage Types are DIFFERENT per Visit, then SELECT the correct Coverage Type under each Visit listed for that Event [C].
6. USE the Coverage Type legend [D] as a guide, if needed.
7. PROVIDE Coverage Notes [E] as needed.
   a. Notes can be documented for each time the Event occurs under Event Coverage, or per Visit.
   b. Notes can be used to specify specific labs that were rolled up into one Event line item.
8. ENTER your e-Signature and click SUBMIT to apply the edits.
   a. Repeat this process for each EVENT listed on the Calendar
9. REVIEW the Calendar once again looking for “X’s” that remain without Coverage Types.
   a. CORRECT any omissions or errors that may exist.
   b. IF none found, mark those events with “NB” and notify the Budget Analyst.

NOTE: The Coverage Analysis may be downloaded to MS Excel for easy viewing.
Below is an example of a completed Coverage Analysis in eResearch. Note how the system presents the Coverage Notes differently between a note for the entire Event (ex. Pregnancy Test-Serum = Females Only) and a note for an Event per Visit (ex. Physical Examination-Brief at Screening Visit).

**Coverage Analyst**

**Coverage Analysis Completion**

1. When the Coverage Analysis is complete, DOWNLOAD to either or (example of download provided below).
2. ADD any additional study identifying information to the downloaded document.
3. EMAIL the downloaded document to the Principal Investigator for review and confirmation of agreement.
   a. The PI may confirm agreement via email.
Work Instruction - Coverage Analysis for Clinical Research Studies

4. PROVIDE the following completed documents to the VPR CTO
   a. Coverage Analysis (Billing Grid)
   b. Billing Risk Questionnaire form

Exported Coverage Analysis

<table>
<thead>
<tr>
<th>Event</th>
<th>Additional Codes</th>
<th>Screening</th>
<th>Vist 1</th>
<th>Vist 2</th>
<th>Vist 3</th>
<th>Coverage Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>CBC</td>
<td></td>
<td>X Q1</td>
<td>X R</td>
<td>X R</td>
<td>X R</td>
<td></td>
</tr>
<tr>
<td>Concurrent Medications</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CPT Scan, Without Contract</td>
<td></td>
<td>X R Q1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ECG, EKG</td>
<td></td>
<td>X Q1</td>
<td>X Invoice-R</td>
<td>X NB</td>
<td>X Invoice-R</td>
<td></td>
</tr>
<tr>
<td>Inclusion Exclusion</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Physical Exam - Brief</td>
<td></td>
<td>X R</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pregnancy Test - Semen</td>
<td></td>
<td>X R</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>X/Frnt-Vist selected</td>
<td></td>
<td>X R</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B=Research</td>
<td></td>
<td>X R</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Invoice-R</td>
<td></td>
<td>X R</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SOC=Standard of Care</td>
<td></td>
<td>X R</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NB=NonStable</td>
<td></td>
<td>X R</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>QP=QT Investigational</td>
<td></td>
<td>X R</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q1=QT Routine</td>
<td></td>
<td>X R</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

VPR CTO

Submit to OCR for Institutional Review

1. RECEIVES the Billing Risk Questionnaire form and Coverage Analysis (Billing Grid) from Coverage Analyst.
2. SUBMITS the Billing Risk Questionnaire and Coverage Analysis (Billing Grid) in PDF file format (if needed) to the Office of Clinical Research (OCR).

EXIT CRITERIA

Upon completion of this work instruction, Coverage Analysis is completed and has been submitted to the Office of Clinical Research, completing the Institutional Review process.

APPENDIX A ROLES & RESPONSIBILITIES

RACI Chart

<table>
<thead>
<tr>
<th>FINANCIAL MANAGEMENT</th>
<th>Vice President of Research - Clinical Trial Office</th>
<th>Research Team</th>
</tr>
</thead>
<tbody>
<tr>
<td>CTO Director</td>
<td>Budget Analyst Team</td>
<td>Medical Records Coding Team</td>
</tr>
<tr>
<td></td>
<td>Lead Senior Intermediate</td>
<td>Lead Senior Intermediate</td>
</tr>
<tr>
<td>Coverage Analysis</td>
<td>- Assign Coverage Types</td>
<td>- Coverage Analysis Completion</td>
</tr>
<tr>
<td></td>
<td>R</td>
<td>R</td>
</tr>
</tbody>
</table>

Under each function, define either the function or role and assign R, A, C or I

R = Responsible party
A = Accountable party
C = Consulting party
I = Party to be kept informed

APPENDIX B DEFINITIONS

Coverage Types
The following coverage types are the billing codes to be used on the billing grid for the coverage analysis:

- **Invoice-R** – Research event that must be invoiced to Sponsor or funding agency for payment.
- **NB** – Non-Billable – Event is not billable to funding sponsor or to third party payer.
- **Q0** – Investigational item/service in Qualified Clinical Trial (QCT) reported to a third party payer. Must be billed with V70.7 diagnosis code, Q0 modifier and NCT# (ClinicalTrials.gov registration number).
- **Q1** – Routine item/service in a Qualified Clinical Trial (QCT) billed to a third party payer. Must be billed with V70.7 diagnosis code, Q1 modifier and NCT# (ClinicalTrials.gov registration number).
- **R** – Research – Research charge being covered by Sponsor or funding agency, but does not require specific invoicing. May also include (ex. Informed Consent, Eligibility Criteria, Concomitant Medications, Medical History, Questionnaires, etc).
- **SOC** – Standard of Care - Conventional care procedure being charged as part of a non-qualified clinical trial to a third party payer; no additional codes or modifiers needed.

**REFERENCES**

- CMS NCD 310.1 Clinical Trial Policy
- Novitas Clinical Trials and Devices
- HOP 7.7.1, Budgeting & Billing for Clinical Services Provided as Part of Research Involving Human Subjects
- OCR Policy 1.3.2. Clinical Trial Billing
- SOP-005_CoverageAnalysis

**END OF DOCUMENT**