

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 Trukera Medical representative, please review your EHR or paper Intake 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.**

# 1 Note the sign or symptom of disease that prompted the ordering of the test.

You may use one of the standard dry eye questionnaires (DEQ-5, OSDI, or SPEED), design your own questionnaire, or utilize the Ocular Surface Health Questionnaire provided by Trukera Medical. Dry eye signs or symptoms must be noted in the patient's record for that day. Ideally, the symptom questionnaire can be added to 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 return visit 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 be indicated as still active and/or unstable.

Osmolarity testing can be performed anytime during the office visit if medical documentation exists showing the doctor had the intent for the test to be performed, and that intent has been authenticated by the doctor via a handwritten or electronic signature in the chart. See rules in 42 CFR 410 and Pub.100-02 chapter 15, §80.6.1.

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 return for the monitoring of therapy, all of which must be properly documented.

**Trukera** MEDICAL | OCULAR SURFACE HEALTH  
**Questionnaire**

NAME \_\_\_\_\_

Check all symptoms experienced since last visit.

- Dry eyes
- Blurry vision
- Redness
- Burning
- Itching
- Light sensitivity
- Excessive tearing/watery eyes
- Tired eyes/eye fatigue
- Stringy mucous in or around the eyes
- Foreign body sensation
- Contact lens discomfort
- Scratchy, feeling of sand or grit in eye
- Fluctuating vision

Have you ever treated yourself for dry eyes?  Yes  No  
Have you used any eye drops in the last 2 hours?  Yes  No

**FOR OFFICE USE ONLY** Initials of Ordering Physician \_\_\_\_\_ Date \_\_\_\_\_

**OSMOLARITY MEASUREMENTS**

Right Eye (OD) \_\_\_\_\_ (mOsm/L)      Left Eye (OS) \_\_\_\_\_ (mOsm/L)

Inter-eye difference is >8 mOsm/L  Yes  No

Osmolarity  Normal  Abnormal

Patient dry eye severity  Mild  Moderate  Severe

Schedule for dry eye workup  Yes  No

300      320      340  
(mOsm/L)

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# 2 Specifically identify the test in the medical record by stating "tear osmolarity test was ordered."

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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 note) 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."<sup>1</sup> (see point #5)

Payers 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, (e.g., TOT).

1. Medicare Program Integrity Manual. CMS Publication 100-08, Chapter 3; para. 3.3.2.4 Exception 2.

### 3 Record the numerical tear osmolarity test results 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. Determining if the test results were normal or abnormal is critical documentation. This can be a simple 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.

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Inter-eye difference is >8 mOsm/L  Yes  No

Osmolarity  Normal  Abnormal

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Schedule for dry eye workup  Yes  No

300 320 340 (mOsm/L)

### 4 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, as payers will not pay for a test unless it is used to manage the patient, as indicated in point #3. Even if the test results are “normal” that should be indicated in the progress notes, because it has direct 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 (e.g., “Tear Osmolarity ‘Normal’, Dry Eye no longer considered, Dx Ocular Allergy”).

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

*“Patient returning per doctor directed orders for evaluation of the tear film, osmolarity findings, and retinal macular evaluation secondary to ocular surface disease noted at last visit 3 months ago.”*

### 5 Ensure the clinician signed the record indicating that everything in the chart that day was reviewed and confirmed as medically necessary.

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As discussed in point #2, a verbal order is not unusual 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.