

**National Correct Coding Initiative**  
**Correct Coding Solutions, LLC**  
**A Medicare Contractor**  
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May 28, 2010

Laxmaiah Manchikanti, MD  
American Society of Interventional Pain Physicians  
2831 Lone Oak Road  
Paducah, KY 42003

Dear Dr. Manchikanti:

I thank you for your letter dated April 26, 2010 in which you comment about a National Correct Coding Initiative (NCCI) edit proposal. We discussed your letter with CMS (Centers for Medicare and Medicaid Services) which owns NCCI and makes all decisions about its contents.

CMS proposed to add a new edit to the NCCI with column one CPT code 62290 (injection procedure for discography . . . ; lumbar) and column two CPT code 62311 (injection, single . . . epidural or subarachnoid; lumbar, sacral (caudal)) not allowing use of NCCI-associated modifiers. The edit is based on CMS anesthesia and global surgery rules. CMS anesthesia rules prohibit a provider from billing separately for anesthesia for a procedure that he/she performs. (Moderate conscious sedation may be billed separately with some procedures.) CMS global surgery rules include post-procedure pain management in the global surgical package.

CMS will implement this edit allowing use of NCCI-associated modifiers. If the provider performs an epidural/subarachnoid lumbar/sacral injection for treatment of post discography pain, it should not be reported separately. However, if the patient has discography and an epidural/subarachnoid lumbar/sacral injection for treatment of pain unrelated to the discography procedure, the injection may be reported separately with an NCCI-associated modifier. This new edit will appear in NCCI version 16.3 scheduled for October 1, 2010.

CMS will also modify the existing NCCI edit with column one CPT code 62291 (injection procedure for discography . . . ; cervical or thoracic) and column two CPT code 62310 (injection, single . . . epidural or subarachnoid; cervical or thoracic) to allow use of NCCI-associated modifiers. The appropriate use of NCCI-associated modifiers with this edit is similar to that described in the previous paragraph. This edit has not allowed use of NCCI-associated modifiers since October 1, 2009. This edit modification will appear in NCCI version 16.3 scheduled for October 1, 2010.

CMS and we appreciate your assistance with the NCCI.

Sincerely,



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Cc: Marsha Mason-Wonsley, CMS CPT Coding Specialist Melinda Martin, Sagar Pampati, ASIPP

