

National Correct Coding Initiative
Correct Coding Solutions, LLC
A Medicare Contractor
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May 27, 2011

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 20, 2011 in which you request modification or deletion of numerous National Correct Coding Initiative (NCCI) edits. We discussed your letter with CMS (Centers for Medicare and Medicaid Services) which owns NCCI and makes all decisions about its contents.

Many of the edits that you cite have been addressed previously by CMS at your request. I am attaching copies of two letters dated July 29, 2009 and May 28, 2010 addressing those issues. In particular the July 29, 2009 letter addresses the edits bundling nerve block codes into global surgical procedures. The same rationale applies to the epidural injection CPT codes 62310-62319. The letter also addresses issues related to bundling the nerve block CPT codes into CPT codes 20552, 20553, 20600-20610, 27093, and 27096. Once again the issues related to bundling CPT codes 62310-62319 into this latter group of codes are similar. Issues related to CPT code 62290 were addressed in the May 28, 2010 letter.

CMS did address edits that had not been previously addressed per your request:

- (1) CMS has already incorporated deletion of the edits with column one CPT codes 27093 and 27096 each with column two CPT codes 64490 and 64493 into the July 1, 2011 version 17.2 of NCCI. These deletions will be retroactive to the implementation dates of these edits, April 1, 2011.
- (2) CMS will also delete the following column one/column two CPT code pair edits in NCCI version 17.2 scheduled for July 1, 2011. These deletions will be effective July 1, 2011. (Generally, if an edit has been in effect for a very long time, an edit deletion based on new information is not retroactive. The below edits have been active since 1999.)
 - a. 20605-20610/64550 (There is no active edit, 20600/64550.)
 - b. 20610/64553 and 20610/64718 (There are no active edits bundling 20600-20605 with either 64553 or 64718.)
 - c. 27093/64714 (There is no active edit, 27096/64714.)



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The other edits bundling nerve block CPT codes or epidural injection CPT codes into the other global surgical procedures that you listed will retain their current modifier indicators for the reasons cited in my prior letters. Most of these edits have been in place since April 1, 2009 or earlier. We have not received complaints from others that any of these edits are interfering with patient care. We have also not received any documented complaints that Medicare or Medicaid claims processing contractors are not allowing use of modifier 59 to bypass those edits with modifier indicator of "1" allowing use of modifier 59 if clinically appropriate.

If you would like to submit medical records redacting all patient identifying information indicating that a particular edit is interfering with medical care or not permitting proper payment for medical care, CMS will reconsider the relevant edit.

CMS and we appreciate your assistance with the NCCI.

Sincerely,

Signed electronically by Niles R. Rosen, M.D

Niles R. Rosen, M.D.
Medical Director
National Correct Coding Initiative
Correct Coding Solutions LLC
Phone: 317-571-1720

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

Attachments – 1) letter dated July 29, 2009 from Dr. Niles R. Rosen
2) letter dated May 28, 2010 from Dr. Niles R. Rosen