December 13, 2016

Joseph S. Cheng, MD
Henry H. Woo, MD
American Association of Neurological Surgeons / Congress of Neurological Surgeons
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Washington, DC 20005

Frank Voss, MD
Louis Stryker, MD
American Academy of Orthopaedic Surgeons
9400 West Higgins Road
Rosemont, Illinois 60018-4976

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Morgan P. Lorio, MD
International Society for the Advancement of Spine Surgery
2397 Waterbury Circle, Suite 1
Aurora, IL 60504

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The North American Spine Society
7075 Veterans Boulevard
Burr Ridge, IL 60527

Dear Drs. Cheng, Woo, Voss, Stryker, Yue, Lorio, and Mitchell:

I thank you for your letter dated November 7, 2016 in which you comment about two active and nine proposed National Correct Coding Initiative (NCCI) procedure to procedure (PTP) edits. We discussed your letter with CMS (Centers for Medicare & Medicaid Services) which owns NCCI and makes all decisions about its contents. The Attachment lists the specific edits.

The PTP edits with column one CPT codes 63042 (Laminotomy (hemilaminectomy), with decompression of nerve root(s), including partial facetectomy, foraminotomy and/or excision of herniated intervertebral disc, reexploration, single interspace; lumbar) and 63047 (Laminectomy, facetectomy and foraminotomy (unilateral or bilateral with decompression of spinal cord, cauda equina and/or nerve root(s), (eg, spinal or lateral recess stenosis)), single vertebral segment; lumbar) each with column two CPT code 69990 (Microsurgical techniques, requiring use of operating microscope (List

[Image: CMS logo]
separately in addition to code for primary procedure)) are based on a provision in the CMS Internet Only Manual, Claims Processing Manual, Publication 100-04, Chapter 12, Section 20.4.5 (Allowable Adjustments) which states:

"Effective January 1, 2000, the replacement code (CPT 69990) for modifier -20 - microsurgical techniques requiring the use of operating microscopes may be paid separately only when submitted with CPT codes:

61304 through 61546
61550 through 61711
62010 through 62100
63081 through 63308
63704 through 63710
64831
64834 through 64836
64840 through 64858
64861 through 64871
64885 through 64891
64905 through 64907."

Since CPT codes 63042 and 63047 are not in the listed code ranges, these edits must be retained because NCCI is required to adhere to provisions in the CMS Internet Only Manual.

CMS will implement the edits with column one CPT codes 22853 (Insertion of interbody biomechanical device(s) (eg, synthetic cage, mesh) with integral anterior instrumentation for device anchoring (eg, screws, flanges), when performed, to intervertebral disc space in conjunction with interbody arthrodesis, each interspace (List separately in addition to code for primary procedure)) and 22854 (Insertion of intervertebral biomechanical device(s) (eg, synthetic cage, mesh) with integral anterior instrumentation for device anchoring (eg, screws, flanges), when performed, to vertebral corpectomy(ies) (vertebral body resection, partial or complete) defect, in conjunction with interbody arthrodesis, each contiguous defect (List separately in addition to code for primary procedure)) each with column two anterior instrumentation CPT codes 22845-22847. The code descriptors for CPT codes 22853 and 22854 include "integral anterior instrumentation for device anchoring". It is a misuse of CPT codes 22845-22847 to report this anterior instrumentation integral to the procedures described by CPT codes 22853 and 22854. CMS will allow use of NCCI-associated modifiers to bypass one of these edits if a provider performs additional anterior instrumentation unrelated to anchoring the device.

CMS will not implement the edits with column one CPT code 22859 (Insertion of intervertebral biomechanical device(s) (eg, synthetic cage, mesh, methyImethacrylate) to intervertebral disc space or
vertebral body defect without interbody arthrodesis, each contiguous defect (List separately in addition
to code for primary procedure)) with column two anterior instrumentation CPT codes 22845-22847.

The new PTP edits will be implemented in the April 1, 2017 version of NCCI.

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
Fax: 317-571-1745

Cc:  Erika D. Armstrong, CMS COR for the NCCI/MUE Programs
    Valeria Allen, CMS/CPI NCCI/MUE Program Manager
    Marsha Mason-Wonsley, CMS CPT Coding Specialist
    Wendy Alexander, PhD, CMS Director DASG/DMA
    Catherine Jeakle Hill, AANS/CNS
    Joanne Willer, CPC, AAOS
    Liz Vogt, ISASS
    Allison Waxler, MS, NASS

Attachment (one page)
ATTACHMENT – CMS DECISIONS ON PROPOSED NCCI PTP EDITS TO WHICH AANS/CNS/AAOS/ISASS/NASS OBJECTED IN A JOINT LETTER DATED NOVEMBER 7, 2016

Modifier indicator of “0” means that modifiers associated with the NCCI **MAY NOT** be used to explain any circumstances where both procedures/services of a code pair edit may be reported on the same date of service by the same provider.

Modifier indicator of “1” means that modifiers associated with the NCCI **MAY** be used to explain the circumstances as described in the letter where both procedures/services of a code pair edit may be reported on the same date of service by the same provider.

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