



June 11, 2019

National Correct Coding Initiative/Capital Bridge LLC
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NCCIPTMUE@cms.hhs.gov

Dear NCCI Administrators:

Thank you for your response to our letter of 4-16-19 regarding CCI edits for CPT codes 22845-22847 with CPT codes 22853 and 22854.

In the 4-16-19 letter, ISASS noted that Spine Surgeons are receiving denials for these procedures even when using appropriate modifiers to indicate separate approaches and/or separate diagnoses. The 2017 CCI edits bundled anterior spinal instrumentation codes 22845-22847 with 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).

ISASS, along with the American Association of Neurological Surgeons (AANS), the Congress of Neurological Surgeons (CNS), and the North American Spine Society (NASS) wrote letters objecting to the edits at the time (please see attachments A and B) and noted that the edits were not consistent with CPT Professional nomenclature and guidelines. The letters from the societies at that time noted a concern that inappropriate denials would result from the edits and in early 2019, spine surgeons began to report an increase in denials.

There was a noticeable increase in denials from multiple payers beginning in early 2019, and in response to this reported uptick, ISASS submitted the April 19, 2019 letter.

In follow up to the April 19, 2019, Capital Bridge asked us to provide more detailed information and copies of denials. ISASS asked members for copies of denials and have received several that are attached to this letter.

Please note that payers are routinely denying these procedures with reason codes like “lack of medical necessity”, “procedure included/incidental to other procedure(s)”.



We are attaching several denials to illustrate the inappropriate denials which we believe are ultimately based on the 2017 CCI edits.

We believe the presence of these inappropriate denials necessitates deletion of the current edits in order to allow correct reimbursement for these spine procedures.

Thank you for your time and consideration of our comments. Please contact ISASS via Matthew Twetten at matthewtwetten@gmail.com or at 773-678-5705 with questions or requests for additional information. We again look forward to working with you to address this concern and future concerns.

Sincerely,

James Yue, MD
CPT Advisor
International Society for the Advancement of Spine Surgery

Morgan P. Lorio, MD, FACS
Chair Coding and Reimbursement Task Force
CPT Alternate Advisor
International Society for the Advancement of Spine Surgery

Attachment 1: 22845-46 and 22853-54 Denial Copies.PDF