

# National Correct Coding Initiative

Correct Coding Solutions, LLC  
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November 6, 2014

Anthony Visco, MD  
President  
The American Urogynecologic Society  
2025 M Street, NW, Suite 800  
Washington, DC 20036

Dear Dr. Visco:

I thank you for your letter dated June 1, 2013 in which you comment about a National Correct Coding Initiative (NCCI) procedure to procedure (PTP) edit proposal. We discussed your letter and attachments with CMS (Centers for Medicare & Medicaid Services) which owns NCCI and makes all decisions about its contents.

The edit proposal was detailed in a letter to you dated March 29, 2013. The PTP edits bundle CPT code 52000 (Cystourethroscopy (separate procedure)) into the column one codes listed on the Attachment. The edits are based on the following principle which will appear in the 2015 version of the *National Correct Coding Initiative Policy Manual for Medicare Services*:

"A cystourethroscopy (CPT code 52000) performed near the termination of an intra-abdominal, intra-pelvic, or retroperitoneal surgical procedure to assure that there was no intraoperative injury to the ureters or urinary bladder and that they are functioning properly is not separately reportable with the surgical procedure."

This policy is consistent with an article in *CPT Assistant* (March 2013, Volume 23, Issue 3, page 14). A copy of this article is attached for your convenience.

Some of the PTP edits are additionally based on the code descriptor for CPT code 52000 which includes the "separate procedure" designation. CMS payment policy does not allow separate payment for codes defined by their code descriptors as a "separate procedure" when performed with another procedure in the same anatomic region.

CMS will allow use of NCCI-associated modifiers with these edits. These modifiers may be used to bypass a PTP edit if the cystourethroscopy performed with one of the column one coded procedures is in a different anatomic region and is unrelated to assuring that there is no intraoperative injury to the ureters or urinary bladder and that they are functioning properly.



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CMS understands that your society thinks that a cystourethroscopy should be an integral component of some of the column one coded procedures, but those column one codes are not valued by RUC as such. Your society has the option to work with the AMA CPT Editorial Panel to revise relevant CPT code descriptors and/or work with the AMA RUC to revise the vignettes for relevant procedures.

These edits will be implemented in the January 1, 2015 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.  
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National Correct Coding Initiative  
Correct Coding Solutions LLC  
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Cc: Marsha Mason-Wonsley, CMS Coding Specialist  
Valeria Allen, CMS COR for the NCCI/MUE Programs  
Linda Smith, CMS Director DASG/DMA  
Jill Rathbun, Galileo Consulting Group on behalf of AUGS  
Lora Plaskon, MD, AUGS  
Marc Toggia, MD, AUGS  
Michelle Zinnert, AUGS  
Douglass Hale, MD, AUGS

Enclosure (*CPT Assistant*, March 2013, Volume 23, Issue 3, page14)  
Attachment (five pages)

**ATTACHMENT – Proposed NCCI edits with CPT code 52000  
(Cystourethroscopy (separate procedure)) paired with various surgical  
procedures to be implemented on January 1, 2015 in NCCI Version 21.0**

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

<b><u>Column 1 Code</u></b> (Payable service)	<b><u>Column 2 Code</u></b> (Denied Service)	<b><u>Modifier Indicator / Action</u></b>
38562	52000	1 / Will be added to NCCI 1/1/2015
38564	52000	1 / Will be added to NCCI 1/1/2015
38571	52000	1 / Will be added to NCCI 1/1/2015
38572	52000	1 / Will be added to NCCI 1/1/2015
38765	52000	1 / Will be added to NCCI 1/1/2015
38770	52000	1 / Will be added to NCCI 1/1/2015
38780	52000	1 / Will be added to NCCI 1/1/2015
45110	52000	1 / Will be added to NCCI 1/1/2015
45111	52000	1 / Will be added to NCCI 1/1/2015
45112	52000	1 / Will be added to NCCI 1/1/2015
45113	52000	1 / Will be added to NCCI 1/1/2015
45114	52000	1 / Will be added to NCCI 1/1/2015
45116	52000	1 / Will be added to NCCI 1/1/2015
45119	52000	1 / Will be added to NCCI 1/1/2015
45120	52000	1 / Will be added to NCCI 1/1/2015
45121	52000	1 / Will be added to NCCI 1/1/2015
45123	52000	1 / Will be added to NCCI 1/1/2015
45126	52000	1 / Will be added to NCCI 1/1/2015
45135	52000	1 / Will be added to NCCI 1/1/2015
45136	52000	1 / Will be added to NCCI 1/1/2015
45160	52000	1 / Will be added to NCCI 1/1/2015
45395	52000	1 / Will be added to NCCI 1/1/2015
45397	52000	1 / Will be added to NCCI 1/1/2015
45400	52000	1 / Will be added to NCCI 1/1/2015
45402	52000	1 / Will be added to NCCI 1/1/2015
45540	52000	1 / Will be added to NCCI 1/1/2015
45541	52000	1 / Will be added to NCCI 1/1/2015
45550	52000	1 / Will be added to NCCI 1/1/2015
45560	52000	1 / Will be added to NCCI 1/1/2015
45562	52000	1 / Will be added to NCCI 1/1/2015
45563	52000	1 / Will be added to NCCI 1/1/2015

**ATTACHMENT (Continued)**

<u>Column 1 Code</u> (Payable service)	<u>Column 2 Code</u> (Denied Service)	<u>Modifier Indicator / Action</u>
51575	52000	1 / Will be added to NCCI 1/1/2015
51585	52000	1 / Will be added to NCCI 1/1/2015
51595	52000	1 / Will be added to NCCI 1/1/2015
51597	52000	1 / Will be added to NCCI 1/1/2015
53400	52000	1 / Will be added to NCCI 1/1/2015
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55815	52000	1 / Will be added to NCCI 1/1/2015
55821	52000	1 / Will be added to NCCI 1/1/2015
55831	52000	1 / Will be added to NCCI 1/1/2015
55840	52000	1 / Will be added to NCCI 1/1/2015
55842	52000	1 / Will be added to NCCI 1/1/2015
55865	52000	1 / Will be added to NCCI 1/1/2015
55866	52000	1 / Will be added to NCCI 1/1/2015
56640	52000	1 / Will be added to NCCI 1/1/2015
57106	52000	1 / Will be added to NCCI 1/1/2015

**ATTACHMENT (Continued)**

<u>Column 1 Code</u> (Payable service)	<u>Column 2 Code</u> (Denied Service)	<u>Modifier Indicator / Action</u>
57107	52000	1 / Will be added to NCCI 1/1/2015
57109	52000	1 / Will be added to NCCI 1/1/2015
57110	52000	1 / Will be added to NCCI 1/1/2015
57111	52000	1 / Will be added to NCCI 1/1/2015
57112	52000	1 / Will be added to NCCI 1/1/2015
57120	52000	1 / Will be added to NCCI 1/1/2015
57200	52000	1 / Will be added to NCCI 1/1/2015
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57220	52000	1 / Will be added to NCCI 1/1/2015
57230	52000	1 / Will be added to NCCI 1/1/2015
57240	52000	1 / Will be added to NCCI 1/1/2015
57250	52000	1 / Will be added to NCCI 1/1/2015
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57280	52000	1 / Will be added to NCCI 1/1/2015
57282	52000	1 / Will be added to NCCI 1/1/2015
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57289	52000	1 / Will be added to NCCI 1/1/2015
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57330	52000	1 / Will be added to NCCI 1/1/2015
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57425	52000	1 / Will be added to NCCI 1/1/2015
57426	52000	1 / Will be added to NCCI 1/1/2015
57530	52000	1 / Will be added to NCCI 1/1/2015
57531	52000	1 / Will be added to NCCI 1/1/2015
57540	52000	1 / Will be added to NCCI 1/1/2015
57545	52000	1 / Will be added to NCCI 1/1/2015
57550	52000	1 / Will be added to NCCI 1/1/2015

**ATTACHMENT (Continued)**

<u>Column 1 Code</u> (Payable service)	<u>Column 2 Code</u> (Denied Service)	<u>Modifier Indicator / Action</u>
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57556	52000	1 / Will be added to NCCI 1/1/2015
57720	52000	1 / Will be added to NCCI 1/1/2015
58150	52000	1 / Will be added to NCCI 1/1/2015
58152	52000	1 / Will be added to NCCI 1/1/2015
58180	52000	1 / Will be added to NCCI 1/1/2015
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58210	52000	1 / Will be added to NCCI 1/1/2015
58240	52000	1 / Will be added to NCCI 1/1/2015
58260	52000	1 / Will be added to NCCI 1/1/2015
58262	52000	1 / Will be added to NCCI 1/1/2015
58263	52000	1 / Will be added to NCCI 1/1/2015
58270	52000	1 / Will be added to NCCI 1/1/2015
58275	52000	1 / Will be added to NCCI 1/1/2015
58280	52000	1 / Will be added to NCCI 1/1/2015
58285	52000	1 / Will be added to NCCI 1/1/2015
58290	52000	1 / Will be added to NCCI 1/1/2015
58291	52000	1 / Will be added to NCCI 1/1/2015
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58294	52000	1 / Will be added to NCCI 1/1/2015
58400	52000	1 / Will be added to NCCI 1/1/2015
58410	52000	1 / Will be added to NCCI 1/1/2015
58520	52000	1 / Will be added to NCCI 1/1/2015
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58541	52000	1 / Will be added to NCCI 1/1/2015
58542	52000	1 / Will be added to NCCI 1/1/2015
58543	52000	1 / Will be added to NCCI 1/1/2015
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58553	52000	1 / Will be added to NCCI 1/1/2015
58554	52000	1 / Will be added to NCCI 1/1/2015
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58661	52000	1 / Will be added to NCCI 1/1/2015
58662	52000	1 / Will be added to NCCI 1/1/2015

**ATTACHMENT (Continued)**

<u>Column 1 Code</u> (Payable service)	<u>Column 2 Code</u> (Denied Service)	<u>Modifier Indicator / Action</u>
58700	52000	1 / Will be added to NCCI 1/1/2015
58720	52000	1 / Will be added to NCCI 1/1/2015
58940	52000	1 / Will be added to NCCI 1/1/2015
58943	52000	1 / Will be added to NCCI 1/1/2015
58950	52000	1 / Will be added to NCCI 1/1/2015
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58953	52000	1 / Will be added to NCCI 1/1/2015
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58956	52000	1 / Will be added to NCCI 1/1/2015
58957	52000	1 / Will be added to NCCI 1/1/2015
58958	52000	1 / Will be added to NCCI 1/1/2015
58960	52000	1 / Will be added to NCCI 1/1/2015

then modifier 22, *Increased Procedural Services*, may be appended to code 59510, *Routine obstetric care including antepartum care, cesarean delivery, and postpartum care*. To further clarify, when reporting code 59510 with modifier 22 appended, a copy of the operative report should be submitted with the claim to the third-party payer. In addition, the diagnosis code for multiple gestations should be indicated. Documentation must support the substantial additional work and the reason for the additional work (eg, increased intensity, time, and technical difficulty of the procedure; severity of the patient's condition; greater physical and mental effort required).

## Surgery: Urinary System

**Question:** A physician is performing a hysterectomy that involves extensive dissection around the ureters and bladder. The physician performs a cystoscopy at the end of the procedure to ensure that there wasn't any injury to the bladder, and that the ureters are functioning properly. May code 52000 be additionally reported for the cystoscopy procedure?

**Answer:** No. It would not be appropriate to report CPT code 52000, *Cystourethroscopy (separate procedure)*, in addition to a hysterectomy, when performed during the

same operative session. If cystourethroscopy is used after a major surgical procedure to check work, it is not separately reported.

## Modifiers

**Question:** May modifier 22, *Increased Procedural Services*, be appended to add-on codes?

**Answer:** Yes. When the service(s) provided is substantially greater than that is typically required for the listed procedure, it may be identified by adding modifier 22, *Increased Procedural Services*, to the usual procedure code. The word *procedural* in the descriptor is intended to indicate that the modifier may be appended to any procedure code, but is not used with the evaluation and management (E/M) services codes. As previously stated, a copy of the operative report should be submitted with the claim to the third-party payer. Documentation must support the substantial additional work and the reason for the additional work (eg, increased intensity, time, and technical difficulty of the procedure; severity of the patient's condition; greater physical and mental effort required). ♦

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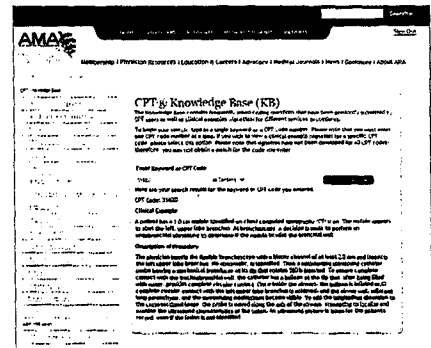
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