

**National Correct Coding Initiative**  
**Correct Coding Solutions, LLC**  
**A Medicare and Medicaid Contractor**  
**P.O. Box 907**  
**Carmel, IN 46082-0907**  
**Fax: 317-571-1745**

June 14, 2016

Douglass S. Hale, MD  
The American Urogynecologic Society  
2025 M Street, NW, Suite 800  
Washington, DC 20036

Dear Dr. Hale:

I thank you for your letter dated May 17, 2016 in which you comment about 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.

Your letter addresses proposed PTP edits with column one CPT codes 51860 (Cystorrhaphy, suture of bladder wound, injury or rupture; simple), 51865 (Cystorrhaphy, suture of bladder wound, injury or rupture; complicated), and 51880 (Closure of cystostomy (separate procedure)) each with column two CPT code 52000 (Cystourethroscopy (separate procedure)).

You suggest that these edits should be implemented allowing use of NCCI-associated modifiers for situations where the cystourethroscopy precedes the surgical repair and is performed for the purpose of diagnosing the extent of injury to the urinary bladder and determining the procedure to perform.

CMS will implement these edits allowing use of NCCI-associated modifiers as described above. However, a provider should not bypass these edits if the cystourethroscopy is performed during or after repair of the urinary bladder injury to check the completeness of the repair.

These edits will be implemented in the October 1, 2016 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

Phone: 317-752-8735



Cc: Erika Moott, CMS COR for the NCCI/MUE Programs  
Valeria Allen, CMS NCCI/MUE Program Manager  
Marsha Mason-Wonsley, CMS CPT Coding Specialist  
Andrew Ward, PhD, Acting CMS Director, DASG/DMA  
Jill Rathbun, Galileo Consulting Group (on behalf of AUGS)  
Michelle Zinnert, AUGS