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

October 24, 2016

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

Dear Dr. Hale:

I thank you for your letter dated October 2, 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. The PTP edits are listed on the Attachment.

CMS agrees with the AUGS comment which was the reason that CMS originally proposed to allow use of NCCI-associated modifiers with these edits. That is, if a provider performs the procedure described by CPT code 57267 (Insertion of mesh or other prosthesis for repair of pelvic floor defect, each site (anterior, posterior compartment), vaginal approach (List separately in addition to code for primary procedure)) for a procedure listed in the *CPT Manual* as a primary procedure for add-on CPT code 57267 in addition to a third procedure reported with a CPT code listed as a column one code in one of the PTP edits, the physician may bypass the PTP edit with an NCCI-associated modifier.

These edits will be implemented in the January 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 Moott, CMS COR for NCCI/MUE Programs
Valeria Allen, CMS/CPI NCCI/MUE Program Manager
Wendy Alexander, PhD, CMS Director of DASG/DMA
Marsha Mason-Wonsley, CMS CPT Coding Specialist
Jill Rathbun, Galileo Consulting Group (on behalf of AUGS)
Michelle Zinnert, AUGS

Attachment (one page)

ATTACHMENT – Proposed NCCI PTP edits with CPT code 57267 (Insertion of mesh or other prosthesis for repair of pelvic floor defect, each site (anterior, posterior compartment), vaginal approach (List separately in addition to code for primary procedure)) to be implemented on January 1, 2017 in NCCI Version 23.0

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

Column 1 Code (Payable service)	Column 2 Code (Denied Service)	Modifier Indicator / Action
57268 57270 57280 57288 57425	57267 57267 57267 57267 57267	1 / Will be added to NCCI on 1/1/2017 1 / Will be added to NCCI on 1/1/2017 1 / Will be added to NCCI on 1/1/2017 1 / Will be added to NCCI on 1/1/2017 1 / Will be added to NCCI on 1/1/2017