

National Correct Coding Initiative
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September 1, 2015

Joseph Cheng, MD
American Association of Neurological Surgeons /Congress of Neurological Surgeons
725 15th Street, NW, Suite 500
Washington, DC 20005

Dear Dr. Cheng:

I thank you and your colleagues for meeting by teleconference with CMS (Centers for Medicare & Medicaid Services) and us on August 26, 2015 to discuss issues related to the National Correct Coding Initiative (NCCI). We discussed the meeting this morning with CMS which owns NCCI and makes all decisions about its contents.

In particular you discussed concerns about procedure to procedure (PTP) edits that bundle arthrodesis CPT codes 22630 and 22633 with laminectomy CPT codes 63042 and 63047 and related paragraphs in the *National Correct Coding Initiative Policy Manual for Medicare (Medicaid) Services* ("Manuals").

CMS appreciates your time and the additional information that you provided. CMS does not plan to modify the PTP edits nor the paragraphs in the Manuals as it continues to believe that these coding combinations are not appropriate when performed at the same interspace. CMS thinks that you might consider an alternative approach to this issue through the CPT Editorial Panel. For example, you might consider proposing an add-on code for use with the arthrodesis codes that would describe additional decompression when performed.

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

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Cc: Valeria Allen, CMS COR for the NCCI/MUE Programs
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