



March 5, 2010

Linda Dietz  
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National Correct Coding Initiative  
Correct Coding Solutions, LLC  
PO Box 907  
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Re: NCCI Edits 16.2 – CPT Code Combination 37204/77776-77778<sup>0</sup>

The Society of Interventional Radiology (SIR) and the American College of Radiology (ACR), which represent over 36,000 physician specialists in the United States, agree with the Centers for Medicare & Medicaid Services' (CMS) proposed 37204/77750<sup>0</sup> National Correct Coding Initiative (NCCI) edit. However, we do have concerns with the proposed edit that bundles CPT codes 77776-77778 (*interstitial radiation source application...*) into CPT code 37204 (*Transcatheter occlusion or embolization (eg, for tumor destruction, to achieve hemostasis, to occlude a vascular malformation), percutaneous, any method, non-central nervous system, non-head or neck*) when performed together on the same day of service by the same provider.

In those instances when an interventional radiologist is the authorized user, it is appropriate to report the relevant code for *interstitial radiation source application (77776, 77777, or 77778)* in addition to the services for the actual embolization procedure (37204), as these are two distinct services. Specifically, the interstitial radiation source instillation involves releasing the isotope into the target volume via the upstream arterial arcade. The delivery is complicated and irreversible so various aspects of the infusion, including volume distribution, flow rate, vascular overlap, contrast intensity and aggregate quality must be carefully performed. Numerous injections may be required and real time reassessment is necessary during the procedure. These aspects of the procedure are different than those typically necessary for embolization with non-radioactive particles. Since these particles do have an embolic effect on the vasculature in which they are released, the work and risks of this embolization are inherent to CPT 37204 and are a separate component of the complete procedure. As such, the SIR and the ACR respectfully request that CMS allow a modifier indicator of "1" for the combination code pair 37204/77776-77778 when performed by an interventional radiologist.

Thank you for your consideration of these recommendations. We greatly appreciate this opportunity to provide input. If you have any questions or would like to discuss this edit issue further, please contact Jenna Kappel, SIR Director, Coding and Economics at 703-691-1805 or Stephanie Le, ACR Economics & Health Policy Department at (800) 227-5463, Ext. 4584

Sincerely,

A handwritten signature in black ink, appearing to read "Fueredi".

George Fueredi, MD  
Chair, Economics Committee  
Society of Interventional Radiology

A handwritten signature in black ink, appearing to read "Daniel Picus".

Daniel Picus, M.D.  
Chair, Committee on Coding and Nomenclature  
American College of Radiology



cc: Brian F. Stainken, M.D., FSIR, SIR President  
Gary Siskin, MD, Coding Education & Application Workgroup Chair  
William Rilling, MD, SIR  
Tricia McClenny, SIR Associate Executive Director  
Jenna Kappel, MPH, MA, SIR  
Diane Hayek, RCC, ACR  
Stephanie Le, ACR