

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

March 17, 2010

George Fueredi, MD
Society of Interventional Radiology
3975 Fair Ridge Drive, Suite 400 North
Fairfax, VA 22033-2911

Daniel Picus, MD
American College of Radiology
1891 Preston White Drive
Reston, VA 20191-4397

Dear Drs. Fueredi and Picus:

I thank you for your letter dated March 5, 2010 in which you comment about proposed National Correct Coding Initiative (NCCI) edits. We discussed your letter with CMS (Centers for Medicare and Medicaid Services) which owns NCCI and makes all decisions about its contents.

The proposed edits have column one CPT code 37204 (transcatheter occlusion or embolization (eg, for tumor destruction . . .), percutaneous . . .) with column two CPT codes 77776-77778 (interstitial radiation source application . . .). CMS will implement these edits in NCCI version 16.2 scheduled for July 1, 2010 not allowing use of NCCI-associated modifiers.

In your letter you state that when an interventional radiologist performs the “actual embolization procedure (37204)” with radioactive particles, there is additional work and the procedure is more complex than the embolization procedure with non-radioactive particles. You further state that this additional work should be reported with CPT codes 77776-77778. CMS thinks that this use of CPT codes 77776-77778 is a misuse of these codes. These codes should be used to report application of a radiation source into interstitial tissues, not infusion of radioactive particles into the blood stream through a blood vessel.

If the work associated with an embolization procedure using radioactive particles is significantly greater than that with non-radioactive particles, providers may choose to report their procedures with modifier 22 (increased procedural services). Your organizations also have the option of seeking a new code describing this procedure from the AMA CPT Editorial Panel.



George Fueredi, MD
Daniel Picus, MD
March 17, 2010
Page 2

CMS and we appreciate your assistance with the NCCI.

Sincerely,



Niles R. Rosen, M.D.
Medical Director
National Correct Coding Initiative
Correct Coding Solutions LLC
Phone: 317-571-1720

Cc: Marsha Mason-Wonsley, CMS CPT Coding Specialist
Gary P. Siskin, MD, SIR
Sean M. Tutton, MD, SIR
Katharine L. Krol, MD, SIR
Debbie L. Ramsburg, SIR
Jenna Kappel, SIR
Bibb Allen, Jr., MD, ACR
Diane Hayek, ACR
Stephanie Le, ACR