

**National Correct Coding Initiative**  
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**A Medicare and Medicaid Contractor**  
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November 21, 2017

James Yue, MD  
Morgan P. Lorio, MD  
International Society for the Advancement of Spine Surgery  
International Advocates for Spine Patients  
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Dear Drs. Yue and Lorio:

I thank you for meeting with CMS (Centers for Medicare & Medicaid Services) and us on August 30, 2017 and for your follow-up letter dated September 1, 2017 in which you comment about active National Correct Coding Initiative (NCCI) procedure to procedure (PTP) edits. We discussed the teleconference and your letter with CMS which owns NCCI and makes all decisions about its contents.

The PTP edits bundle anterior instrumentation CPT codes **22845-22847** into CPT codes **22853** (Insertion of interbody biomechanical device(s) (eg, synthetic cage, mesh) with integral anterior instrumentation for device anchoring (eg, screws, flanges), when performed, to intervertebral disc space in conjunction with interbody arthrodesis, each interspace (List separately in addition to code for primary procedure)) and **22854** (Insertion of intervertebral biomechanical device(s) (eg, synthetic cage, mesh) with integral anterior instrumentation for device anchoring (eg, screws, flanges), when performed, to vertebral corpectomy(ies) (vertebral body resection, partial or complete) defect, in conjunction with interbody arthrodesis, each contiguous defect (List separately in addition to code for primary procedure)). Based on the code descriptors for CPT codes 22853 and 22854, these procedures include integral anterior instrumentation for device anchoring. A physician should not report CPT codes 22845-22847 for this integral anterior instrumentation for device anchoring. These edits allow use of NCCI-associated modifiers to bypass the edits to report additional anterior instrumentation unrelated to anchoring the device.

CMS will retain these edits and has addressed your concerns in the 2018 version of the *National Correct Coding Initiative Policy Manual for Medicare Services* (“Manual”), Chapter 4, Section F (Spine (Vertebral Column)), Subsection 10 which states:

“10. CPT codes 22853 and 22854 describe insertion of interbody biomechanical device(s) into intervertebral disc space(s). Integral anterior instrumentation to anchor the device to the intervertebral disc space when performed is not separately reportable. It is a misuse of anterior instrumentation CPT codes (e.g., 22845-22847) to report this integral anterior instrumentation. However, additional anterior instrumentation (i.e., plate, rod) unrelated to anchoring the device may be reported separately appending an NCCI-associated modifier such as modifier 59.”



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This Manual is now posted on the CMS NCCI website and is effective January 1, 2018.

CMS and we appreciate your assistance with the NCCI.

Sincerely,

**Signed electronically by Niles R. Rosen, M.D.**

Niles R. Rosen, M.D.  
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