

Louisiana Department of Health Health Plan Advisory 17-3 February 10, 2017

Errors in the NCCI Quarter 1 2017 Edit File: Physical and Occupational Therapy Codes

The Centers for Medicare and Medicaid Services (CMS) identified an error in the Medicaid National Correct Coding Initiative (NCCI) Outpatient Hospital (OPH) Procedure-to-Procedure (PTP) edit file which was implemented on Jan. 1, 2017. The error involves four CPT codes for physical therapy and occupational therapy that are new in 2017:

Physical therapy evaluation, moderate complexity
Physical therapy evaluation, high complexity
Re-evaluation of physical therapy established plan of care
Occupational therapy evaluation, low complexity

The error involves three PTP edits:

Column 1	Column 2
97162	97165
97163	97165
97165	97164

In the 2017 Quarter 1 OPH edit file, the three edits above have a Correct Coding Modifier Indicator (CCMI) of "0." They should have a CCMI of "1," which would indicate that the PTP edit should be bypassed if an appropriate NCCI PTP-associated modifier is appended to one of the codes.

CMS has indicated the error will be corrected in the 2017 Quarter 2 OPH edit file retroactive to Jan. 1. However, until the error is corrected, there could be many inappropriate denials if the edits are implemented with a CCMI of "0."

CMS is strongly encouraging states to either (a) change the CCMI for those three edits in their OPH system from "0" to "1" or (b) deactivate those three edits in their OPH system until the 2017 Quarter 2 NCCI edits are implemented.

Note: The 2017 Quarter 1 Practitioner (PRA) PTP edit file also has a CCMI of "0" for those three edits. Those PRA edits are correct and will not be changed.

Health Plans are to make necessary updates using one of the methods that CMS has provided to correct this issue with your NCCI claims editing.