



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

February 9, 2018

Niles R. Rosen, MD
Medical Director
Linda S. Dietz, RHIA, CCS, CCS-P
Coding Specialist
National Correct Coding Initiative (NCCI)
Correct Coding Solutions LLC
P.O. Box 907
Carmel, IN 46082-0907

RE: *National Correct Coding Initiative Policy Manual for Medicare Services*, Chapter 11,
Section H, Subsections 2-3

Dear Dr. Rosen and Ms. Dietz:

On behalf of the American Speech-Language-Hearing Association, I write to request clarification regarding revisions to incorporate a new Current Procedural Terminology (CPT®) code for cognitive treatment services in Chapter 11, Section H, Subsections 2-3 of *National Correct Coding Initiative (NCCI) Policy Manual for Medicare Services*, which became effective January 1, 2018.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 191,500 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students.

ASHA specifically seeks clarification regarding the omission of the new Medicare G-code for cognitive treatment—G0515 (cognitive skills development, each 15 minutes)—when changes were made to the *NCCI Policy Manual* to replace CPT code 97532 (cognitive skills development, each 15 minutes). CPT code 97532 was deleted, effective December 31, 2017, and replaced in the 2018 CPT code set by 97127 (cognitive function interventions). However, the Centers for Medicare & Medicaid Services (CMS) assigned 97127 a status of “invalid” and created G0515 (development of cognitive skills development, each 15 minutes) to replace 97532 when reporting cognitive treatment services provided to Medicare beneficiaries.* Although NCCI correctly inserted CPT code 97127 where 97532 was previously referenced on page 13 of Chapter 11 of the *NCCI Policy Manual*, G0515 was not included, even though it is the only code recognized by the Medicare program for cognitive treatment. Therefore, ASHA respectfully requests that NCCI clarify whether its current policy regarding the new CPT code 97127 also applies to G0515, and to ensure corrections are updated in the *NCCI Policy Manual* and to any corresponding NCCI edits, if warranted.

February 9, 2018

Page 2

Thank you for the opportunity to request clarification on revisions made to the *National Correct Coding Initiative Policy Manual for Medicare Services* as they relate to coding for cognitive treatment services. If you or your staff have any questions, please contact Neela Swanson, ASHA's director of health care policy, coding and reimbursement, at nswanson@asha.org.

Sincerely,

A handwritten signature in black ink that reads "Elise Davis-McFarland". The signature is written in a cursive, flowing style.

Elise Davis-McFarland, PhD, CCC-SLP
2018 ASHA President

* U.S. Department of Health and Human Services. (2017). Rules and regulation. *Federal Register*, 82, 52976-53371. Retrieved from <https://www.gpo.gov/fdsys/pkg/FR-2017-11-15/pdf/2017-23953.pdf>.