To Whom It May Concern:

This letter is to identify and seek resolution regarding National Correct Coding Initiative (NCCI) edits on CPT codes 97530 and 97150 billed by occupational therapists effective January 1, 2020.

My concern is that the proposed bundling of the occupational therapy (OT) evaluation codes in the 97150 and 97530 practitioner and hospital edits, as well as prohibiting use of the -59 modifier by the same discipline, do not give due consideration to the instances where patients require 97150 (therapeutic procedure, group) treatment or 97530 (therapeutic activities) be initiated during the same therapy session or on the same day as the OT evaluation. It is not an uncommon practice for an occupational therapist to complete an evaluation, establish a plan of care, and start treatment based on that plan of care on the same day.

The edits also conflict with current CMS policy. As stated in Chapter 15 of the Medicare Benefit Policy Manual, “The evaluation and treatment may occur and are both billable either on the same day or at subsequent visits. It is appropriate that treatment begins when a plan is established.”

Therefore, I respectfully request that the NCCI staff discontinue the evaluation code bundling for Practitioner and Hospital PTP edits associated with CPT codes 97150 and 97530.

Sincerely,