COMPLIANCE ALERT

TO: Compliance Alert Distribution List

FROM: Maryann C. Palmeter, CPC, CENTC, CPCO, CHC
Director, Office of Physician Billing Compliance

SUBJECT: 2017 CPT® Changes Impacting Moderate ( Conscious) Sedation

DATE: December 15, 2016

Significant changes have been made in 2017 CPT® which impact how moderate (conscious) sedation is reported. These changes were made to accommodate changes in the practice of medicine; time needed to complete a procedure (and, therefore, time needed to maintain sedation of the patient) has decreased. Furthermore, the revisions provide much needed clarification regarding the reporting of moderate sedation services.

MODERATE SEDATION PRIOR TO 2017

- CPT® editions prior to 2017 contained “Appendix G” which listed over 400 procedure codes for which moderate sedation was included in the valuation of the diagnostic or therapeutic service necessitating the sedation. As such, it was not appropriate for the same physician or other qualified health care professional (the “Provider”) to report both the service requiring the moderate sedation and the moderate sedation codes 99143-99145.

- When a second physician or qualified health care professional other than the Provider who performed the diagnostic or therapeutic service (the “Second Provider”) provided moderate sedation in the facility setting (e.g., hospital, outpatient hospital/ambulatory surgery center, skilled nursing facility) for the procedures listed in Appendix G, the Second Provider could report a code in the range of 99148-99150. In the nonfacility setting (e.g., office, freestanding imaging center), codes 99148-99150 would not be reported.

- Moderate sedation was reported with procedure codes 99143, 99144, 99145, 99148, 99149, and 99150.

- Moderate sedation was reported in 30 minute increments.
MODERATE SEDATION 2017 AND AFTER

- A “Trained Observer” is defined by CPT® as an individual who is qualified to monitor the patient during the procedure and who has no other duties (e.g., assistant at surgery) during the procedure.

- Appendix G has been deleted.

- All procedure codes previously included in Appendix G referenced above have been revised to remove the moderate sedation symbol. This means that for these procedure codes, moderate sedation is no longer included in the valuation of the procedure code and may be reported separately.

- All changes to codes, guidelines, and parenthetical notes, as a result of the removal of the moderate sedation symbol and the addition of new moderate sedation codes, are included in a new Moderate Sedation section in CPT®.

Preservice, Intraservice, and Postservice Work

CPT elaborates on these 3 areas and provides lists of what is included under each area.

Preservice and Postservice Work

Preservice and postservice activities required for moderate sedation are included in the work described by each of the new moderate sedation codes and are not reported separately. Time spent performing pre- and postservice work is not included when determining billable time. In addition, once continuous face-to-face time with the patient has ended, additional face-to-face time with the patient is not added to the intraservice time, however, it is considered as part of the postservice work.

Complete lists of activities included in both preservice and postservice work is included in CPT in the Medicine section.

Intraservice Work

Intraservice time is used to determine the appropriate CPT code to report moderate sedation services. Intraservice time begins with the administration of the sedating agent(s) and ends when the procedure is completed, the patient is stable for recovery status, and the Provider providing the sedation ends personal continuous face-to-face time with the patient.

If the Provider who provides the sedation services also performs the procedure supported by sedation, the Provider will supervise and direct an independent trained observer who will assist in monitoring the patient’s level of consciousness and physiological status throughout the procedure.

Procedure codes 99143, 99144, 99145, 99148, 99149, and 99150 have been deleted.
Moderate sedation reported in 15 minute increments. More than half of the time associated with the procedure code must be provided and documented in order to report the sedation service. However, sedation of less than 10 minutes is not reported for any age.

New Moderate Sedation Codes

Codes for same Provider performing the moderate sedation services and the diagnostic or therapeutic service that the sedation supports:

99151 Moderate sedation provided by the same physician or other qualified health care professional performing the diagnostic or therapeutic service that the sedation supports, requiring the presence of an independent trained observer to assist in the monitoring of the patient’s level of consciousness and physiological status; initial 15 minutes of intraservice time, patient younger than 5 years of age

99152 Initial 15 minutes of intraservice time, patient age 5 years or older

+99153 Each additional 15 minutes intraservice time (List separately in addition to code for primary service)

Codes for moderate sedation services provided by a different Provider than the one performing the diagnostic or therapeutic service that supports the sedation:

99155 Moderate sedation provided by a physician or other qualified health care professional other than the physician or other qualified health care professional performing the diagnostic or therapeutic service that the sedation supports; initial 15 minutes of intraservice time, patient younger than 5 years of age

99156 Initial 15 minutes of intraservice time, patient age 5 years or older

+99157 Each additional 15 minutes intraservice time (List separately in addition to code for primary service)

A table displaying the ranges of time taken to perform the sedation service; the age of the patient; and the appropriate code(s) to report based on who is performing the sedation service is attached.

We ask that you please share this information with faculty, residents, fellows, non-physician practitioners and applicable billing staff. Feel free to contact me at 244-2158 if you have any questions.

Attachment: Moderate Sedation Code Selection Table

CC: Elizabeth Ruszczyk
    George Wilson, M.D.
# MODERATE SEDATION CODE SELECTION TABLE
*(Effective for DOS 01/01/17 & after)*

<table>
<thead>
<tr>
<th>Intraservice Time Thresholds</th>
<th>Patient Age</th>
<th>Code (s)</th>
<th>Code (s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than 10 minutes</td>
<td>Any age</td>
<td>Do Not Bill</td>
<td>Do Not Bill</td>
</tr>
<tr>
<td>10-22 minutes</td>
<td>&lt; 5 years</td>
<td>99151</td>
<td>99155</td>
</tr>
<tr>
<td>10-22 minutes</td>
<td>5 years +</td>
<td>99152</td>
<td>99156</td>
</tr>
<tr>
<td>23-37 minutes</td>
<td>&lt; 5 years</td>
<td>99151 + 99153 x 1</td>
<td>99155 + 99157 x 1</td>
</tr>
<tr>
<td>23-37 minutes</td>
<td>5 years +</td>
<td>99152 + 99153 x 1</td>
<td>99156 + 99157 x 1</td>
</tr>
<tr>
<td>38-52 minutes</td>
<td>&lt; 5 years</td>
<td>99151 + 99153 x 2</td>
<td>99155 + 99157 x 2</td>
</tr>
<tr>
<td>38-52 minutes</td>
<td>5 years +</td>
<td>99152 + 99153 x 2</td>
<td>99156 + 99157 x 2</td>
</tr>
<tr>
<td>53-67 minutes (53 min. - 1 hr. 7 min.)</td>
<td>&lt; 5 years</td>
<td>99151 + 99153 x 3</td>
<td>99155 + 99157 x 3</td>
</tr>
<tr>
<td>53-67 minutes (53 min. - 1 hr. 7 min.)</td>
<td>5 years +</td>
<td>99152 + 99153 x 3</td>
<td>99156 + 99157 x 3</td>
</tr>
<tr>
<td>68-82 minutes (1 hr. 8 min - 1 hr. 22 min)</td>
<td>&lt; 5 years</td>
<td>99151 + 99153 x 4</td>
<td>99155 + 99157 x 4</td>
</tr>
<tr>
<td>68-82 minutes (1 hr. 8 min - 1 hr. 22 min)</td>
<td>5 years +</td>
<td>99152 + 99153 x 4</td>
<td>99156 + 99157 x 4</td>
</tr>
<tr>
<td>83 minutes or longer (1 hr. 23 min. - etc.)</td>
<td>&lt; 5 years</td>
<td>Add Units of 99153 to 99151</td>
<td>Add Units of 99157 to 99155</td>
</tr>
<tr>
<td>83 minutes or longer (1 hr. 23 min. - etc.)</td>
<td>5 years +</td>
<td>Add Units of 99153 to 99152</td>
<td>Add Units of 99157 to 99156</td>
</tr>
</tbody>
</table>