



### TESTING CODES ALERT

#### **CMS Releases Questions and Answers Clarifying the Appropriate Use of the CPT Codes for Psychological and Neuropsychological Testing**

In response to ongoing advocacy by the APA Practice Directorate, on June 19, 2008 the Centers for Medicare and Medicaid Services (CMS) posted on the agency's website questions and answers (Q&As) that clarify how the CPT codes for psychological and neuropsychological testing should be used. APA requested this information after a CMS transmittal issued in 2006 resulted in confusion about Medicare's rules for billing multiple codes when testing is administered by a technician or computer. The Q&As clarify when the professional codes for psychological and neuropsychological testing, 96101 and 96118 respectively, can be used to account for the integrative interpretation and comprehensive report writing for services administered by a technician or computer.

Assisted by the National Academy of Neuropsychology and the Society of Personality Assessment, APA has been working for almost two years to address the confusion created by the 2006 CMS transmittal. After months of work by APA and CMS, the CPT Editorial Panel agreed in February 2007 to add language to the *CPT 2008* manual stating that codes 96101 and 96118 can be used for time spent integrating other sources of clinical data, including previously completed and reported technician and computer-administered tests.

Despite the new CPT language, psychologists and facility compliance officers still had reservations about the proper use of the codes based on the 2006 CMS transmittal. Knowing that only a statement from CMS would address those concerns, APA sought to have the agency take further action. In June 2007, CMS agreed to consider publishing a series of Q&As that APA drafted about the codes' usage. While this was a very unusual step for CMS to take, it recognized the need to resolve the confusion arising from the 2006 transmittal. After making some slight revisions and undergoing a very long clearance process, CMS has now posted the Q&As at [https://questions.cms.hhs.gov/cgi-bin/cmshhs.cfg/php/enduser/print\\_alp.php?faq\\_array=9177,9179,9176,9180,9181,9182,9183,9178](https://questions.cms.hhs.gov/cgi-bin/cmshhs.cfg/php/enduser/print_alp.php?faq_array=9177,9179,9176,9180,9181,9182,9183,9178). Psychologists should disregard Question 9178 which addresses testing by physical therapists, occupational therapists, and speech language pathologists.

For additional assistance regarding the testing code Q&As, please contact the Practice Directorate's Government Relations Department at 202-336-5889.

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