Deciphering Brachytherapy Coding and Documentation

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Contact Information

Revenue Cycle Inc.
1817 W. Braker Lane
Bldg. F, suite 200
Austin, Texas  78758

www.revenuecycleinc.com
info@revenuecycleinc.com
(512) 583-2000
Presenters

Tamara Syverson, BSRT(T)
Director of Provider Consulting

Adam Brown, BSRT (T), CMD
Consultant
Disclaimer

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Objectives of this Presentation

Discuss the Process of Care for Brachytherapy

Educate Regarding Proper Coding Including Recent Coding Changes

Provide Guidance on Appropriate Documentation

Emphasize Utilization of Current Reference Materials

Outline Common Brachytherapy Processes
Authoritative Guidance

- Federal Register
- Centers for Medicare & Medicaid Services (CMS)
  - National & Local Coverage Determinations (NCDs & LCDs)
  - Manuals & Transmittals
  - National Correct Coding Initiative (NCCI)
- American Medical Association & CPT® Manual
- OIG Compliance Standards
- Commercial Payor Policies
Retired Brachytherapy LCDs

- Policies remain active when there is evidence of significant problems with performance, billing and/or coding
- Correct claims submission is expected with or without an active LCD

Why are LCDs Retired?

LCDs are retired due to lack of evidence of current problems, or in some cases because the material is addressed by a National Coverage Determination (NCD), a coverage provision in a CMS interpretative manual or an article. Most LCDs are not retired because they are incorrect. The guidance in the retired LCD may be helpful in assessing medical necessity. Where providers have adjusted their billing and coding practices to correspond to the guidance in LCDs, they will want to be very careful in departing from these practices just because the LCD is retired.
## Brachytherapy Reminders

<table>
<thead>
<tr>
<th>For All Brachytherapy Procedures</th>
<th>Practice patterns differ from physician to physician</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Process of care differs from each treatment site</td>
</tr>
<tr>
<td></td>
<td>Billing templates are NOT recommended</td>
</tr>
<tr>
<td></td>
<td>Bill only for work performed &amp; documented</td>
</tr>
<tr>
<td></td>
<td>Codes vary from HDR &amp; LDR</td>
</tr>
<tr>
<td></td>
<td>A “<strong>Procedure Note</strong>” or an “<strong>Operative Note</strong>” is necessary for all brachytherapy procedures</td>
</tr>
</tbody>
</table>
Brachytherapy Process of Care

- Clinical Treatment Planning
- Applicator Placement
- Simulation & Imaging
- Dosimetry
- Treatment Delivery
Clinical Treatment Planning

Professional only

- **77261** Simple planning requires a single treatment area of interest encompassed in a single port or simple parallel opposed ports with simple or no blocking.

- **77262** Intermediate planning requires three or more converging ports, two separate treatment areas, multiple blocks, or special time dose constraints.

- **77263** Complex planning requires highly complex blocking, custom shielding blocks, tangential ports, special wedges or compensators, three or more separate treatment areas, rotational or special beam considerations, combination of therapeutic modalities.
Utilization Guidelines

• Billable once per course
• May be billable more than once if performed by a separate physician at a different location
• Applicable for all treatment techniques
• Documentation must support date of service and complexity

• Treatment planning (CPT code 77263)
  Brachytherapy (other than coronary, which is discussed in another policy) is routinely designated complex (77263) because it requires complex treatment volume design, dose levels near normal tissue tolerance, analysis or special tests, complex fractionation, or delivery concurrent with other therapeutic modalities or treatment of previously irradiated tissues. If brachytherapy is used as an adjunct to external beam therapy, a single complex treatment planning code is used to encompass both modalities, unless provided by a different provider in a different place of service.
Applicator Placement

Brachytherapy may be performed concomitantly with surgical resection or in conjunction with procedures such as endoscopy or angioplasty, which are required to achieve access to the site of the disease. There are two distinct phases required to complete the process known as brachytherapy:

1. The insertion or placement of non-radioactive applicators or conduits that receive or transmit the radioactive material into the body, and
2. The loading of the radioactive material (the active or therapeutic agent) into the conduits or directly into tissue.

May be performed by the radiation oncologist or in collaboration with another physician.
# Placement Codes

<table>
<thead>
<tr>
<th>Code</th>
<th>Descriptor</th>
</tr>
</thead>
<tbody>
<tr>
<td>19296</td>
<td>Placement of radiotherapy after loading balloon catheter into the breast for interstitial radioelement application following partial mastectomy, includes image guidance; on date separate from partial mastectomy</td>
</tr>
<tr>
<td>19297</td>
<td>concurrent with partial mastectomy</td>
</tr>
<tr>
<td>19298</td>
<td>Placement of radiotherapy after loading brachytherapy catheters (multiple tube &amp; button type) into the breast for interstitial radioelement application following (at the time of or subsequent to) partial mastectomy, includes image guidance</td>
</tr>
<tr>
<td>20555</td>
<td>Placement of needles or catheters into muscle &amp;/or soft tissue for subsequent interstitial radioelement application (at the time of or subsequent to the procedure)</td>
</tr>
<tr>
<td>31643</td>
<td>Bronchoscopy with placement of catheter(s) for intracavitary radioelement application</td>
</tr>
<tr>
<td>41019</td>
<td>Placement of needles, catheters, or other device(s) into the head and/or neck region (percutaneous, transoral, or transnasal) for subsequent interstitial radioelement application</td>
</tr>
</tbody>
</table>
### Placement Codes Cont.

<table>
<thead>
<tr>
<th>Code</th>
<th>Descriptor</th>
</tr>
</thead>
<tbody>
<tr>
<td>43241</td>
<td>Endoscopy with transendoscopic intraluminal tube or catheter placement</td>
</tr>
<tr>
<td>55875</td>
<td>Transperineal placement of needles or catheters into prostate for interstitial radioelement application, with or without cystoscopy</td>
</tr>
<tr>
<td>55920</td>
<td>Placement of needles or catheters into pelvic organs &amp;/or genitalia (except prostate) for subsequent interstitial radioelement application</td>
</tr>
<tr>
<td>57155</td>
<td>Insertion of uterine tandem and/or ovoids for clinical brachytherapy</td>
</tr>
<tr>
<td>57156</td>
<td>Insertion of a vaginal radiation afterloading apparatus for clinical brachytherapy</td>
</tr>
<tr>
<td>58346</td>
<td>Insertion of Heyman capsules for clinical brachytherapy</td>
</tr>
<tr>
<td>C9725</td>
<td>Placement of endorectal Intracavitary application for high intensity brachytherapy</td>
</tr>
<tr>
<td>0190T</td>
<td>Placement of intraocular source</td>
</tr>
</tbody>
</table>
Treatment Devices

- Billable once per course
- Typically billed as simple (CPT® 77332); however, there are instances where complex would be appropriate
- Vaginal cylinder and Tandem & Ovoid (Ring) included in placement code PE for MPFS
Brachytherapy Simulations

- Typically performed for:
  - Acquisition of imaging and planning information
  - Verification of source placement
  - Confirmation of applicator placement prior to treatment

Coding guidelines vary depending on the procedure performed
Simulation

Professional & Technical

77280 Simple simulation of a single treatment area

77285 Intermediate simulation two separate treatment areas

77290 Complex simulation of three or more treatment areas, particle beam, rotation or arc therapy, complex or custom blocking, brachytherapy simulation, hyperthermia probe verification, or any use of contrast material
"The process of measuring the anatomy and placing marks on the skin or immobilization device to help the team direct the radiation safely and exactly to the intended location is called "simulation." For example, in code 77290, brachytherapy simulation is the complex process of making position adjustments and for performing dose calculations (code 77290). Nonradioactive "dummy" sources are used to geographically define the "eventual position" of the radioactive sources in temporary implant devices. Code 77280 is used to report the simple simulation for subsequent "check" verification simulations during the course of radiotherapy with temporary implants to confirm or correct applicator position.”
9. Partial breast high dose rate brachytherapy may be performed two times a day. The first therapeutic radiology simulation for the course of therapy may be complex and reported as CPT code 77290. However, subsequent simulations during the course of therapy should be reported as CPT code 77280.

# Brachytherapy Isodose Planning

<table>
<thead>
<tr>
<th>Professional and Technical</th>
<th>77316 Brachytherapy isodose plan; simple (calculation(s) made from 1 to 4 sources, or remote afterloading brachytherapy, 1 channel), <strong>includes basic dosimetry calculation(s)</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>77317 Intermediate (calculation(s) made from 5 to 10 sources, or remote afterloading brachytherapy, 2-12 channels), <strong>includes basic dosimetry calculation(s)</strong></td>
</tr>
<tr>
<td></td>
<td>77318 Complex (calculation(s) made from over 10 sources, or remote afterloading brachytherapy, over 12 channels), <strong>includes basic dosimetry calculation(s)</strong></td>
</tr>
</tbody>
</table>
3D Plan CPT® 77295

- 3D planning may be applicable based on the plan performed
  - Standard requirements apply
  - Billed instead of the brachytherapy isodose plan

Simulation (77280-77295)
For brachytherapy, simulation may require the use of imaging examinations of the implanted sources or applicator(s) containing dummy (i.e., non-radioactive) sources. These films of the implanted sources are used to develop isodose curves and other dosimetry, and may be billed separately, when appropriate. CPT code 77295 may be billed as part of the brachytherapy process when the needed parameters are included (i.e. 3D volume reconstruction with dose volume histogram for target and normal tissues, etc.). Code 77295 precludes the use of codes 77316-77318 for the same treatment volume.
Treatment Delivery (LDR)

Intracavitary

- 77761 Intracavitary simple; 1-4 sources
- 77762 Intracavitary intermediate; 5-10 sources
- 77763 Intracavitary complex; >10 sources

Interstitial

- 77778 Interstitial complex; >10 sources

Professional and Technical
Code Revision

• **77778** Interstitial radiation source application, complex, includes supervision, handling, loading of radiation source, when performed
  
  – Includes the work of CPT® code 77790; therefore, not separately reportable
  
  – Use CPT® code 77799 (Unlisted procedure, clinical brachytherapy) to report interstitial LDR procedures that do not meet the level requirement for 77778, previously reported with codes 77776 and 77777
## Treatment Delivery (HDR)

### Professional and Technical

<table>
<thead>
<tr>
<th>HCPCS Code</th>
<th>Descriptor</th>
</tr>
</thead>
<tbody>
<tr>
<td>77767</td>
<td>Remote afterloading high dose rate radionuclide skin surface brachytherapy, includes basic dosimetry, when performed; lesion diameter up to 2.0 cm or 1 channel</td>
</tr>
<tr>
<td>77768</td>
<td>Remote afterloading high dose rate radionuclide skin surface brachytherapy, includes basic dosimetry, when performed; lesion diameter over 2.0 cm and 2 or more channels, or multiple lesions</td>
</tr>
<tr>
<td>77770</td>
<td>Remote afterloading high dose rate radionuclide interstitial or intracavitary brachytherapy, includes basic dosimetry, when performed; 1 channel</td>
</tr>
<tr>
<td>77771</td>
<td>Remote afterloading high dose rate radionuclide interstitial or intracavitary brachytherapy, includes basic dosimetry, when performed; 2-12 channels</td>
</tr>
<tr>
<td>77772</td>
<td>Remote afterloading high dose rate radionuclide interstitial or intracavitary brachytherapy, includes basic dosimetry, when performed; over 12 channels</td>
</tr>
</tbody>
</table>
Electronic Brachytherapy

Technical Only

- **0394T** High dose rate electronic brachytherapy, *skin surface application*, per fraction, includes basic dosimetry, when performed

- **0395T** High dose rate electronic brachytherapy, *interstitial or intracavitary treatment*, per fraction, includes basic dosimetry, when performed

When reporting codes 0394T or 0395T the following codes cannot also be reported: 77261-77263, 77300, 77306 – 77307, 77316 – 77318, 77332 – 77334, 77336, 77427, 77431, 77432, 77435, 77469, 77470, 77499, 77761 – 77763, 77770 – 77772, 77778 and 77789
<table>
<thead>
<tr>
<th>Code</th>
<th>Brachytherapy Source (or Radiopharmaceutical)</th>
</tr>
</thead>
<tbody>
<tr>
<td>C1716</td>
<td>Gold 198, per source</td>
</tr>
<tr>
<td>C1717</td>
<td>High dose rate iridium 192, per source</td>
</tr>
<tr>
<td>C1719</td>
<td>Non-high dose rate iridium 192, per source</td>
</tr>
<tr>
<td>C2616</td>
<td>Non-stranded, Yttrium-90, per source</td>
</tr>
<tr>
<td>C2634</td>
<td>Non-stranded, high activity, Iodine 125, &gt;1.01 mCi, per source</td>
</tr>
<tr>
<td>C2635</td>
<td>Non-stranded, high activity, palladium-103, &gt;2.2 mCi, per source</td>
</tr>
<tr>
<td>C2636</td>
<td>Linear source, non-stranded, palladium-103, per 1mm</td>
</tr>
<tr>
<td>C2637</td>
<td>Non-stranded, ytterbium-169, per source</td>
</tr>
<tr>
<td>C2638</td>
<td>Stranded, Iodine-125, per source</td>
</tr>
<tr>
<td>C2639</td>
<td>Non-stranded, Iodine-125, per source</td>
</tr>
<tr>
<td>C2640</td>
<td>Stranded, palladium-103, per source</td>
</tr>
<tr>
<td>C2641</td>
<td>Non-stranded, palladium-103, per source</td>
</tr>
<tr>
<td>C2642</td>
<td>Stranded, Cesium-131, per source</td>
</tr>
<tr>
<td>C2643</td>
<td>Non-stranded, Cesium-131, per source</td>
</tr>
<tr>
<td>C2644</td>
<td>Brachytherapy source, cesium-131 chloride solution, per millicurie</td>
</tr>
<tr>
<td>C2698</td>
<td>Brachytherapy source, stranded, not otherwise specified, per source</td>
</tr>
<tr>
<td>C2699</td>
<td>Brachytherapy src, non-stranded, not otherwise specified, per src</td>
</tr>
</tbody>
</table>
## Supplies & Miscellaneous

<table>
<thead>
<tr>
<th>Code</th>
<th>Descriptor</th>
</tr>
</thead>
<tbody>
<tr>
<td>C1715</td>
<td>Brachytherapy needle</td>
</tr>
<tr>
<td>C1728</td>
<td>Catheter, brachytherapy seed administration</td>
</tr>
<tr>
<td>Q3001</td>
<td>Radioelement for brachytherapy; any type, each</td>
</tr>
<tr>
<td>19499</td>
<td>Unlisted procedure, breast</td>
</tr>
<tr>
<td>53899</td>
<td>Unlisted procedure, urinary system</td>
</tr>
<tr>
<td>55899</td>
<td>Unlisted procedure, male genital system</td>
</tr>
<tr>
<td>58999</td>
<td>Unlisted procedure, female genital system (non-obstetrical)</td>
</tr>
<tr>
<td>77799</td>
<td>Unlisted procedure, clinical brachytherapy</td>
</tr>
</tbody>
</table>
Medical Physics Services (77336, 77370 and 77331)

CPT code 77336 is a "weekly code;" however, for radiation therapy treatment that is not administered in five weekly fractions (such as brachytherapy) or for a course of radiation therapy consisting of one or two fractions, code 77336 may be reported.

CPT code 77370 may be justified for the complex interrelationships of electron and photon ports and complex dosimetric considerations in brachytherapy, including high dose rate remote afterloader applications, intravascular brachytherapy treatments, and interstitial radioactive seed implantation.

CPT code 77331 is Special dosimetry (e.g. TLD, microdosimetry) when prescribed by a physician. In some instances, measurement of the delivered radiation dose may be used to guide and determine the dose to selected positions within or around the implant treatment volume. (This can be very helpful, especially in difficult case such as retreatment using brachytherapy in previously irradiated areas.)
Continuing Medical Physics

Technical Only

77336 Continuing medical physics consultation, including assessment of treatment parameters, quality assurance of dose delivery, and review of patient treatment documentation in support of the radiation oncologist, reported per week of therapy

Utilization Guidelines:

- Billable once per five fraction period
- During final treatment week three or more fractions are required
- Documentation required to support physics review and parameters checked
Special Physics Consult

Technical Only

77370 Special medical radiation physics consultation

Utilization Guidelines:
• Must be ordered by a physician for a specific reason
• Report by the physicist addressing the specific request
• Physician signature on the report is required
• Billed on the date of the report
4. Brachytherapy (CPT codes 77750-77790) includes radiation treatment management (CPT codes 77427 and 77431) and continuing medical physics consultation (CPT code 77336). CPT codes 77427, 77431, and 77336 should not in general be reported separately with brachytherapy services. However, if a patient receives external beam radiation treatment and brachytherapy treatment during the same time period, radiation treatment management and continuing medical physics consultation may be reported for the external beam radiation treatments. Additionally, if a patient has multi-step brachytherapy, it may be appropriate to separately report continuing medical physics consultation with the brachytherapy.
Documentation Requirements

• Detailed procedure note for each fraction
  – Site
  – Applicator placement
  – Imaging and data acquired
  – Planning
  – Dose, treatment time, number of channels, needles or sources
  – Completion and discharge
Brachytherapy Diagrams

- Examples include:
  - HDR Cylinder
  - HDR Accelerated Partial Breast Irradiation (APBI)
  - LDR Prostate Seed Implant

- Intended to demonstrate coding differences and required documentation for common brachytherapy techniques

- Additional codes may apply based on practice patterns, setting, supporting documentation and medical necessity
Patient Agrees to XRT

Insertion

Simulation and CT

Planning

Patient Treated

Insertion

Verification Simulation and CT

Patient Treated

Special Physics Consult and Continuing Physics

Charge Capture: Clinical Planning 77263 (P)

Charge Capture: Insertion of Cylinder 57156 (P/TC) Simple Treatment Device 77332 (TC)

Charge Capture: Complex Simulation 77290 (P/TC)

Charge Capture: Brachytherapy Isodose Plan 77316 (P/TC)

Charge Capture: Treatment 77770 1 channel (P/TC) HDR Iridium Source C1717 (TC)

Charge Capture: Insertion of Cylinder 57156 (P/TC)

Charge Capture: Simple Simulation 77280 (P/TC)

Charge Capture: HDR Treatment 77770 1 channel (P/TC) HDR Iridium Source C1717 (TC)

Charge Capture: Special Physics Consult 77370 (TC) Continuing Medical Physics 77336 (TC)

Physician Clinical Treatment Planning:
- detail the “Planned Course” of therapy
- provide specific orders for services
- medical necessity statements
- request special physics consult

Insertion of Applicator:
MD Performs procedure and documents via procedure note

Simulation & CT:
Imaging of applicator and placement for planning purposes. Documented within procedure note

Brachytherapy Isodose Plan:
Utilizing CT scan, isodose plan is completed and documented.

Source Activity:
Activity of HDR source is determined and documented

Treatment Delivery:
Treatment delivery documented by a procedure note and information from HDR unit.

Source Activity:
Activity of HDR source is determined and documented

Treatment Delivery:
Treatment delivery documented by a procedure note and information from HDR unit.

Special Physics Consult:
Physicist details work provided and report is signed by MD

Continuing Physics:
Treatment, planning, dosing, etc. is checked and documented by physics

The cylinder is included in placement code Practice Expense for the professional and is considered non-billable.

If volume of interest and critical structure(s) are used for planning a 3D plan, 77295, may be billable instead of the 77316.

If 77295, NCCI edits will apply to the simulation and imaging.

Source is not billable in freestanding facility.

If a change is made that requires a new isodose plan, it is appropriate to bill a new plan with the supporting medical necessity.

Source is not billable in freestanding facility.

Special Physics Consult is dependant on documented physician request.
Patient Agrees to XRT

Physician Clinical Treatment Planning:
- detail the "Planned Course" of therapy
- provide specific orders for services
- medical necessity statements
- request special physics consult

Charge Capture: Clinical Planning 77263 (P)

Simulation and CT:
Simulation & CT:
Imaging of applicator and placement for planning purposes. Documented within procedure note

Charge Capture: Complex Simulation 77290 (P/TC)

Brachytherapy Isodose Plan:
Utilizing CT scan, isodose plan is completed and documented.

Charge Capture: Brachytherapy Isodose Plan 77317 (P/TC)

Applicator Insertion

Planning

Am

Fractions 1-10

PM

Charge Capture: Simple Simulation 77280 (P/TC)

Imaging and Verification Simulation:
Catheter is imaged and measurements and catheter parameters are verified and documented

Charge Capture: Simple Simulation 77280 (P/TC)

Charge Capture: HDR Treatment Delivery 77771 (P/TC)
HDR Iridium 192 source C1717 (TC)

HDR Treatment Delivery and Source:
Treatment is delivered and documented by HDR unit documentation and procedure note by the MD

Charge Capture: HDR Treatment Delivery 77771 (P/TC)
HDR Iridium 192 source C1717 (TC)

Source is not billable in freestanding facility.

Additional Codes

Special Physics Consult:
Physicist details work provided and report is signed by MD

Charge Capture: Special Physics Consult 77370 (TC)
Continuing Physics: Treatment, planning, dosing, etc. is checked and documented by physics

Special Physics Consult is dependant on documented physician request.

Continuing Physics 77336 (TC) fx 1-5
Continuing Physics 77336 (TC) fx 6-10

If volume of interest and critical structure(s) are used for planning a 3D plan, 77295, may be billable instead of the 77317.
If 77295, NCCI edits will apply to the simulation.
If planning and treatment completed on same date, additional NCCI edits will apply.

Special Physics Consult and Continuing Physics
Patient Agrees to XRT

Volume Study and/or Pubic Arch: 
- MD Performs procedure and documents via procedure note

Pre Planning by Physics or Dosimetry: 
- Brachytherapy Isodose Plan: Utilizing prostate volume, brachytherapy isodose plan is completed and documented

Seed Assay: 
- The brachytherapy seeds are received and an assay is performed and documented.

Urologist: 
- Placement of Needles
- Rad Onc: 
  - Implant sources i.e. LDR tx delivery, US guidance, template, brachy verification simulation documented by a procedure note

Special Physics Consult and Continuing Physics: 
- Special Physics Consult: 
  - Physicist details work provided and report is signed by MD
  - Continuing Physics: 
    - Physicist performs and documents check

Post Implant CT: 
- Perform CT and document procedure via Post Brachytherapy CT note

Post Planning: 
- 3D Simulation: 
  - Physics or dosimetry completes 3D simulation outlining tumor volume and critical structures

Charge Capture: 
- Clinical Planning 77263 (P)
- U/S Volume Study 76873 (P/TC)
- Pubic Arch 77014 (TC) if applicable
- Brachytherapy Isodose Plan 77318 (P/TC)
- Seed Assay 77331 x 1 (P/TC)
- CT Guidance 77014 (TC)
- 3D Simulation 77295 (P/TC)
- Special Physics Consult 77370 (TC)
- Continuing Physics 77336 (TC)
- LDR PSI (Preplanning)
QUESTIONS