

If a conflict arises between a Clinical Payment and Coding Policy and any plan document under which a member is entitled to Covered Services, the plan document will govern. If a conflict arises between a CPCP and any provider contract pursuant to which a provider participates in and/or provides Covered Services to eligible member(s) and/or plans, the provider contract will govern. “Plan documents” include, but are not limited to, Certificates of Health Care Benefits, benefit booklets, Summary Plan Descriptions, and other coverage documents. Blue Cross and Blue Shield of TX may use reasonable discretion interpreting and applying this policy to services being delivered in a particular case. Blue Cross and Blue Shield of TX has full and final discretionary authority for their interpretation and application to the extent provided under any applicable plan documents.

Providers are responsible for submission of accurate documentation of services performed. Providers are expected to submit claims for services rendered using valid code combinations from Health Insurance Portability and Accountability Act approved code sets. Claims should be coded appropriately according to industry standard coding guidelines including, but not limited to: Uniform Billing Editor, American Medical Association, Current Procedural Terminology, CPT® Assistant, Healthcare Common Procedure Coding System, ICD-10 CM and PCS, National Drug Codes, Diagnosis Related Group guidelines, Centers for Medicare and Medicaid Services National Correct Coding Initiative Policy Manual, CCI table edits and other CMS guidelines.

Claims are subject to the code edit protocols for services/procedures billed. Claim submissions are subject to claim review including but not limited to, any terms of benefit coverage, provider contract language, medical policies, clinical payment and coding policies as well as coding software logic. Upon request, the provider is urged to submit any additional documentation.

Intraoperative Neurophysiology Monitoring IONM Coding and Reimbursement Policy

Policy Number: CPCP032

Version 1.0

**Enterprise Clinical Payment and Coding Policy Committee Approval Date:
September 24, 2024**

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Description

This policy addresses coding and reimbursement for Intraoperative Neuromonitoring/IONM services, including Evoked Potentials. This policy is not intended to impact care decisions or medical practice.

Intraoperative neurophysiologic monitoring/IONM describes a variety of procedures used to monitor the integrity of neural pathways during high-risk neurosurgical, orthopedic, and vascular surgeries. It involves the detection of electrical signals produced by the nervous system in response to sensory or electrical stimuli to provide information about the functional integrity of neuronal structures.

The principal goal of IONM is the identification of nervous system impairment on the assumption that prompt intervention will prevent permanent deficits. Correctable factors at surgery include circulatory disturbance, excess compression from retraction, bony structures, hematomas, or mechanical stretching. The technology is continuously evolving with refinements in equipment and analytic techniques, including recording, with several patients monitored under the supervision of a physician who is outside the operating room. Intraoperative neurophysiologic monitoring includes Somatosensory-evoked potentials/SSEP, Motor-evoked potentials/MEP (using transcranial electrical stimulation), Brainstem auditory-evoked potentials/BAEP, Electromyogram monitoring/EMG of cranial nerves, Electroencephalogram Monitoring/EEG, and Electrocorticography/EcoG and may be necessary during spinal, intracranial, or vascular procedures.

Evoked potentials/EP are responses (electrical signals) produced by the nervous system in response to a stimulus. These types of monitoring help diagnose nerve disorders, determine the location of the site of nerve damage, and help evaluate the member's condition after treatment or during surgery.

Reimbursement Information:

The plan reserves the right to request supporting documentation. Failure to adhere to coding and billing policies may impact claims processing and reimbursement.

Supervision Requirements and Provider Responsibilities

Supervision requirements and provider responsibilities for each procedure vary and must be met by the appropriate provider type. The responsibilities of an IONM provider may include, but are not limited to:

- Have readily available data that is essential for evaluation of the member;

- Evaluate and interpret baseline signals and request any changes in the monitoring procedures of the member that are required;
- Interpret all changes from baseline recordings in real time;
- In real time, will evaluate data and recommend or suggest the anatomical areas of the injury in the context of the surgical procedure when possible.

Documentation

Documentation should be captured in the event/chat log during monitoring of the member to determine the appropriate reimbursement. Documentation can include, but is not limited to:

- Event/Chat log documentation of what occurred during monitoring of the member, such as:
 - The operating surgeon (ordering physician) requesting an IONM service by a licensed physician, separate from the surgical team;
 - The audio and video (screen sharing) connection established that includes the specific type of audio and video (screen sharing) connection, e.g., VOiP or screen monitoring. Additional information is provided under *Separately Reimbursable Services for IONM, Billing Requirements* section of this policy.
 - The monitoring physician completed a baseline review verbally with the surgeon using the audio connection;
 - The monitoring physician communicated any events to the surgeon verbally using the audio connection;
 - The monitoring physician completed a closing review verbally with the surgeon;
 - The professional component of monitoring and test interpretation;
 - Start and stop times of the services provided;
 - What was communicated during the service, who was it communicated by, how it was communicated and any other information during the monitoring;
 - Name of technologist and their credentials.

Separately Reimbursable Services for IONM, Billing Requirements

Eligibility for coverage as separately reimbursable service(s) for intraoperative monitoring must meet the following criteria:

- Must be provided to the operating surgeon (ordering physician) by a licensed physician separate from the surgical team (operating surgeon, assistant surgeons, and/or anesthesiologists); and
- Must have the interpreting physician physically in attendance in the operating suite; or

- Must have the interpreting physician be present by means of a real-time remote mechanism for all Electro Neurodiagnostic/END monitoring situations with the following stipulations:
 - The interpreting physician is constantly available to interpret the recording and advise the surgeon; and
 - There is live video (screen sharing) representation of the END monitoring (identical to the information seen by the technician) with a high-quality bi-directional live audio connection that allows the remote interpreting physician to converse with the operating surgeon at any time. (Cell phone connection or cellular walkie-talkie is not considered adequate. Additionally, “live” means contemporaneous monitoring by the physician during the surgery. Review of a CD or other documentation post-operatively does not constitute “live monitoring”.)

The services of the technician in the room and the monitoring equipment are not separately payable from the reimbursement to the monitoring physician (or the monitoring company). Reimbursement for technician services and equipment may be negotiated directly with the facility.

CPT Codes +95940 & +95941

Intraoperative Neurophysiology CPT add-on codes **95940** and **95941** are used for ongoing neurophysiologic monitoring, testing, and data interpretation distinct from performance of specific type(s) of baseline neurophysiologic study(s) performed during surgical procedures to a single member. Additional requirements:

- Professional provider services are included in the procedure’s primary service when services are rendered by the surgeon or anesthesiologist and should not be reported separately.
- Recording and testing is performed personally or by a technologist who is physically present with the member during the service.
- Supervision is performed either in the operating room or by real time connection outside the operating room.
- The monitoring professional must be solely dedicated to performing the intraoperative neurophysiologic monitoring and be available to intervene at all times during the service as necessary, for the reported time period(s). These codes are reported based on the time spent for monitoring only, and not for the number of baseline tests that are rendered, or the parameters monitored. The time spent monitoring excludes time to set up, record and interpret the baseline study, and to remove electrodes at the end of the procedure.

- Report CPT add-on code 95940 for each set of 15-minutes that the monitoring is done from within the operating room in a one-on-one setting. This code should not be used if more than 1 member is monitored or if the services were rendered remotely. *Note, this code cannot be billed for 7-minutes or less.*
- Report CPT add-on code 95941 for each hour of monitoring done from a remote or nearby location for one or more overlapping operative sessions. *Note, this code cannot be billed for 30-minutes or less.*
- Units for these codes must reflect the total duration of one-on-one monitoring even if that time is not in a single continuous block.
- Modifiers TC and 26 do not apply to CPT add-on code 95941.
- Intraoperative neurophysiology monitoring may not be billed by the physician performing an operative or anesthesia procedure as this is included in the global surgical package. (Note, this includes, but not limited to, the neurophysiology testing CPT 90000 series codes for intraoperative neurophysiology testing (e.g., 92653, 95822, 95860-95870, 95907-95913, 95925, 95926, 95927, 95928, 95929, 95930-95937, 95938, 95939).

Additional criteria when billing for CPT add-on codes **95940 and 95941**, can be found in the most recent CPT code book.

HCPCS Code G0453

HCPCS code **G0453** should be billed only for undivided attention by a monitoring provider to a single member and **not** for simultaneous attention by the monitoring provider to more than one member. This code can be billed in multiple units to account for the cumulative time spent exclusively monitoring a single member. Therefore, HCPCS code **G0453** can be billed for 15-minutes of continuous monitoring of the member, followed by an additional 15-minutes later in the same members procedure, which is equal to a total of 30-minutes, or two units. Additional requirements:

- G0453 may not be billed for 7 minutes or less.
- G0453 is reported based on the time spent for monitoring only, and not for the number of baseline tests that are rendered, or the parameters monitored.
- Units for G0453 must be billed for time spent for one-on-one monitoring to a single member. Units for this code must reflect the total duration of one-on-one monitoring even if that time is not in a single continuous block.
- Modifiers TC and 26 do not apply to HCPCS code G0453.

- Intraoperative neurophysiology monitoring may not be billed by the physician performing an operative or anesthesia procedure as this is included in the global surgical package.

Coding Tips

- Baseline studies (e.g., EMGs, NCVs), should not be billed more than one time per operative session.
- IONM monitoring time is counted from the incision time or the time when the baseline interpretation is communicated to the surgeon by the monitoring physician (whichever is later) to the closing time or monitoring end (whichever is earlier).
- Modifier -26 must be appended for the professional component of monitoring and test interpretation **only**.
- The technical component is the responsibility of the facility.
- Documentation must support appropriate separately reimbursable IONM services for eligible reimbursement.
- Additional timed codes may not be billed such as 95961; A more appropriate code that does not require time should be billed. For example, 95822.
- The place of service/POS billed should be the location of the member, such as POS 19, 21, and 22.
- IONM services should be billed to the BCBS plan where the provider rendering the IONM services is physically located/present at the time of service. The provider's billing office address does NOT determine the BCBS plan where services should be billed.
- Train-of-four/TOF monitoring should not be separately billed as it is considered integral to intraoperative monitoring and/or the administration of anesthesia and is primarily done to prevent or avoid permanent neurological injury. Therefore, TOF monitoring or any type of neuromuscular blockade testing, is not separately reimbursed.

Billing Examples

1. **Question:** *Is it appropriate to report, for example, CPT codes 95937 or 95999 for train-of-four testing during intraoperative neural monitoring?* **Answer:** *Train-of-four monitoring is considered integral to intraoperative neuromonitoring and/or administration of anesthesia and, therefore, is not separately reportable. Train-of-four monitoring does not fit the criteria for CPT codes 95937 nor 95999.*

2. **Question:** *Is it appropriate to bill CPT add-on code 95940 for remote or nearby monitoring of multiple patients at the same time?* **Answer:** *No, CPT add-on code 95940 is used for monitoring a single member with the monitoring physician physically in attendance in the operating suite.*
3. **Question:** *How many units of HCPCS code G0453 can be billed for 37 minutes?* **Answer:** *2 units should be billed. A unit of time is attained when the mid-point has passed. A 3rd unit cannot be billed unless the monitoring time reached 38 minutes.*
4. **Question:** *How many units of CPT add-on code 95941 can be billed for 2 hours and 30 minutes?* **Answer:** *2 units should be billed. A unit of time is attained when the mid-point has passed. A 3rd unit cannot be billed unless the monitoring time reached 2 hours and 31 minutes.*
5. **Question:** *Is the time spent performing or interpreting the baseline neurophysiologic study counted as intraoperative monitoring?* **Answer:** *No, this is covered in a separately reportable procedure.*
6. **Question:** *Can I bill the professional component for monitoring and test interpretation separately during an IONM service?* **Answer:** *Yes, the only IONM service that is separately reimbursed is the professional component of the monitoring and the test interpretation, if it is billed with the appropriate documentation.*
7. **Question:** *Is the time spent setting up equipment, removing equipment, or preparing the patient, counted in the IONM time, and included when calculating units?* **Answer:** *No, billing for time spent for these scenarios in addition to the IONM is considered inappropriate and should not be included in the units billed.*
8. **Question:** *What type of format is required to submit a recording?* **Answer:** *Recordings do not need to be submitted to the Plan. The medical records submitted should contain documentation of what occurred during the monitoring, e.g., event/chat logs.*
9. **Question:** *Is the bi-directional live audio connection, that allows the remote interpreting physician to converse with the operating surgeon at any time, required for a certain amount of time for the procedure, or the entire procedure?* **Answer:** *The remote interpreting physician must have high-quality bi-directional live audio connection that allows the remote interpreting physician to converse with the operating surgeon at any time. The interpreting physician must be constantly available to interpret and advise the surgeon.*

10. **Question:** *What is “live video”?* **Answer:** *Live video is screen sharing, not an actual video camera. The monitoring physician must be able to see the technicians screen to be able to interpret the monitoring results and advise the surgeon.*

11. **Question:** *If a provider is physically located in one state and rendering a service for a member in another state, which state should I submit the claim to?*

Answer: *The claim should be submitted to the state plan where the provider is physically located at the time the service is rendered. For example, a provider who is physically located in OK provides a service for a member who is in TX. The provider should submit the claim to the BCBSOK plan.*

Additional Resources

Medical Policy

MED205.011 Intraoperative Neurophysiologic Monitoring (IONM)

References

Centers for Medicaid and Medicare Services (CMS), Billing Medicare for Remote Intraoperative Neurophysiology Monitoring (HCPCS Code G0453). Accessed 06/25/2024. <https://www.cms.gov/medicare/medicare-fee-for-service-payment/physicianfeesched/downloads/faq-remote-ionm.pdf>

Policy Update History

7/20/2021	New policy
7/30/2021	Added billing example
04/22/2022	Annual Review
09/05/2023	Annual Review
09/24/2024	Annual Review