

From the AAP Division of Health Care Finance and Practice Improvement regarding the difference in RVUs between 96110 and 96127:

CPT Code	Status Indicator	CPT Descriptor	Work RVUs	NF PE RVUs	F PE RVUs	PLI RVUs	Total NF RVUs	Total F RVUs
96110	N	Developmental screen w/score	0.00	<b>0.26</b>	NA	0.01	0.27	NA
96127	A	Brief emotional/behav assmt	0.00	<b>0.14</b>	NA	0.01	0.15	NA

The difference in non-facility practice expense (PE) RVUs between the two codes is due to the following:

### 1) Medical supplies

The “typical” standardized tool utilized by CMS to calculate the PE RVUs for each code are slightly different, with the 96110 tool (ASQ) costing slightly more than the 96127 tool (BYI-II):

96127  
 Beck Youth Inventory, Second Edition (BYI-II); Combination Inventory Booklet  
 \$1.96 per booklet

### 2) Clinical staff type

Code 96110 includes a higher pay grade clinical staff type (RN/LPN/MTA) than does code 96127 (Medical/Technical Assistant).

### 3) Clinical staff time

While we recommended (and the RUC agreed) that it takes 15 minutes of clinical staff time for both 96110 and 96117 – CMS disagreed with regard to 96127:

96127 Brief emotional/behav assmt  
 L026A Medical/Technical Assistant  
 NF Scoring completed behavior assessment tool  
 15 minutes (RUC recommendation)  
*CMS changed to 7 minutes as “Instructions suggest that it typically takes 7 minutes for scoring the tests included as standardized tests for this procedure.”*

As such, the AAP has submitted an appeal to CMS for reconsideration of this issue as follows:

The Academy presented direct practice expense (PE) inputs for consideration by the RUC in April 2014, all of which CMS agreed with one exception.

During its refinement, CMS adjusted the RUC-recommended 15 minutes of clinical staff time down to seven minutes, using the following rationale: "Instructions suggest that it typically takes 7 minutes for scoring the tests included as standardized tests for this procedure."

The Academy contacted the three main publishers of behavioral/emotional scales and received the following information on 11/21/14 from the Multi-Systems HealthSystems Research and Development Department:

Hand scoring using the *Quikscore* form:

Conners (ADHD), Third Edition full form: 20 minutes

Conners (ADHD), Third Edition short forms: 10 minutes

Comprehensive Executive Function Inventory (CEFI): 20 minutes

Multi-dimensional Anxiety Scale for Children, Second Edition (MASC 2): 10 minutes

Child Depression Inventory-Second Edition (CDI-2): 10 minutes

Childhood Autism Assessment Rating Scale: 10 minutes

This information was obtained from the authors of the five scales and is consistent with the data presented to the RUC. Therefore, we respectfully request that the RUC recommendation of 15 minutes be utilized in calculating the practice expense for code 96127

It is also worth noting that code 96127 is "A" (active) status, while code 96110 (designated as a 'screening' service per its descriptor -- for which Medicare does not pay), is "N" (noncovered). This means that code 96127 is not budget-neutral and, therefore, subject to greater scrutiny when it comes to its valuation and potential impact on Medicare spending.