



Reimbursement Policy:

Anesthesia (Commercial/Medicare/Medicaid)

POLICY NUMBER	EFFECTIVE DATE:	APPROVED BY
RPC20210013	1/01/2021	RPC (Reimbursement Policy Committee)

Reimbursement Guideline Disclaimer: We have policies in place that reflect billing or claims payment processes unique to our health plans. Current billing and claims payment policies apply to all our products, unless otherwise noted. We will inform you of new policies or changes in policies through postings to the applicable Reimbursement Policies webpages on emblemhealth.com. Further, we may announce additions and changes in our provider manual and/or provider newsletters which are available online and emailed to those with a current and accurate email address on file. The information presented in this policy is accurate and current as of the date of this publication.

The information provided in our policies is intended to serve only as a general reference resource for services described and is not intended to address every aspect of a reimbursement situation. Other factors affecting reimbursement may supplement, modify or, in some cases, supersede this policy. These factors may include, but are not limited to, legislative mandates, physician or other provider contracts, the member's benefit coverage documents and/or other reimbursement, and medical or drug policies. Finally, this policy may not be implemented the same way on the different electronic claims processing systems in use due to programming or other constraints; however, we strive to minimize these variations.

We follow coding edits that are based on industry sources, including, but not limited to, CPT® guidelines from the American Medical Association, specialty organizations, and CMS including NCCI and MUE. In coding scenarios where there appears to be conflicts between sources, we will apply the edits we determine are appropriate. We use industry-standard claims editing software products when making decisions about appropriate claim editing practices. Upon request, we will provide an explanation of how we handle specific coding issues. If appropriate coding/billing guidelines or current reimbursement policies are not followed, we may deny the claim and/or recoup claim payment.

Overview:

EmblemHealth's Anesthesia policy is developed in part using the Centers for Medicare and Medicaid Services (CMS) National Correct Coding Initiative (NCCI) Policy Manual, CMS NCCI edits and the CMS National Physician Fee Schedule, American Society of Anesthesiologists guidelines, and its own medical policies regarding the coding of claims.

These services may include, but are not limited to, general or regional anesthesia, monitored anesthesia care, or other services to provide the patient the medical care deemed optimal. All services described in this policy may be subject to additional EmblemHealth reimbursement policies.

This reimbursement policy applies to services reported on the CMS 1500 Health Insurance Claim Form of Electronic (EDI) HIPAA 5050 compliant 837P format claim submission. Anesthesia services must be submitted with a CPT anesthesia code in the range of 00100-01999, excluding 01953 and 01996, and are reimbursed as time-based using the Standard Anesthesia Formula. CPT codes 01953 and 01996 are not considered anesthesia services and should not be reported as time-based services.

Reimbursement Guidelines:

- Submit claims using the provider NPI for the individual provider. Apply the appropriate anesthesia modifier in the first modifier field.
- Anesthesia CPT® codes should be billed in minutes representing the duration of the service. EmblemHealth will divide the number of minutes billed by 15 (the anesthesia unit equivalent). EmblemHealth will add that number to the assigned Basic Unit Value of the billed CPT® code to determine total anesthesia units.

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- Modifiers P3, P4 or P5 may be billed for additional minutes added to the anesthesia code to represent the corresponding units for these modifiers. Place these in the second modifier field.
- EmblemHealth also require that the "start" and "end" times be provided in the Notes section of an electronic claim, or box 24A on a paper claim.
- CPT® codes for non-anesthesia services, including Qualifying Circumstances, should be billed as one unit; no minutes should be billed for these codes.
- Anesthesia CPT® codes will be reimbursed based on the applicable fee schedule for anesthesia units. Payment will be reduced when a CRNA is supervised. Refer to the modifier information below.
- When more than one anesthesia service is billed for the same date of service, base units will be reimbursed only for the procedure with the highest base unit value. Lesser procedures will be reimbursed for time only.
- When more than one anesthesia service is billed for the same date of service **due to a separate anesthesia session that is not sequential with another session**, clinical documentation is required on appeal. If the documentation clearly indicates a separate anesthesia session occurred, the base units plus time for the separate session may be approve for reimbursement.

Reimbursement Formula and Modifiers:

Reimbursement Formula:

Base Value	<ul style="list-style-type: none"> • Each CPT® anesthesia code is assigned a Base Value. • EmblemHealth follows CMS Anesthesia base units by CPT® code.
Time Reporting	<ul style="list-style-type: none"> • Consistent with CMS guidelines, EmblemHealth requires actual anesthesia time in minutes reported on the claim. Please refer to https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/clm104c12.pdf

Standard Anesthesia Calculation:

$(\text{Base Units} + \text{Physical Status} + \text{Time}) \times \text{Anesthesia Conversion Factor} = \text{Allowance}$

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Anesthesia Modifiers:

Modifier	Description	Reimbursement
AA	Anesthesia services performed personally by the anesthesiologist.	100% of the allowance
AD	Medical supervision by a physician; more than four concurrent anesthesia procedures.	50% of the allowance
QK	Medical direction of two, three or four concurrent anesthesia procedures involving qualified individuals.	50% of the allowance
QX	CRNA service: with medical direction by a physician	50% of the allowance
QY	Medical direction of one qualified non-physician anesthetist by an anesthesiologist.	50% of the allowance
QZ	CRNA service; without medical direction by a physician.	100% of the allowance

Informational Only Modifiers:

NOTE: When Reporting modifiers 23, 47, GC, G8, G9 or QS; no additional reimbursement is allowed above the usual fee for that service.

Modifier	Description
23	Unusual Anesthesia
47	Anesthesia by Surgeon
GC	This service has been performed in part by a resident under the direction of a teaching physician.
G8	Monitored anesthesia care (MAC) for deep complex, complicated, or markedly invasive surgical procedure.
G9	Monitored anesthesia care (MAC) for patient who has a history of severe cardiopulmonary condition.
QS	Monitored anesthesiology care services (can be billed by a qualified non-physician anesthetist or a physician).



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Physical Status Modifiers:

NOTE: EmblemHealth aligns with CMS and do not recognize or issue additional reimbursement for Physical Status (P) modifiers for our Medicare and EH Medicaid plans

- Physical status modifiers identify levels of complexity of the anesthesia services.
- The P-modifiers are reported in conjunction with anesthesia CPT® code (00100-01999) when appropriate.

Modifier	Description	Units
P1	A physical status modifier for a normal healthy patient.	0 units
P2	A physical status modifier for a patient with mild systemic disease.	0 units
P3	A physical status modifier for a patient with severe systemic disease.	1 unit
P4	A physical status modifier for a patient with severe systemic disease that is a constant threat to life.	2 units
P5	A physical status modifier for a moribund patient who is not expected to survive without the operation.	3 units
P6	A physical status modifier for a declared brain-dead patient whose organs are being removed for donor purposes.	0 units

Qualifying Circumstances for Anesthesia:

Consistent with CMS, EmblemHealth does not allow separate reimbursement outside of the primary anesthesia code. These codes are assigned a status indicator of "B" (bundled code) on the CMS Physician Fee schedule and are not eligible for separate reimbursement under Medicare guidelines.

As per CMS, the value for the qualifying circumstances has already been included in the RVUs for the primary anesthesia procedure codes. Payment for these services is always included in payment for other services not specified. There are no RVUs or payment amount for these codes and separate payment is not made.

The following Qualifying Circumstances Codes are not reimbursable:

CPT Code	Description
99100	Anesthesia for patient of extreme age, younger than 1 year and older than 70 (List separately in addition to code for primary anesthesia procedure)
99116*	Anesthesia complicated by utilization of total body hypothermia (List separately in addition to code for primary anesthesia procedure).



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CPT Code	Description
99135	Anesthesia complicated by utilization of controlled hypotension (List separately in addition to code for primary anesthesia procedure).
99140	Anesthesia complicated by emergency conditions (specify) (List separately in addition to code for primary anesthesia procedure)

** As per NYS Medicaid physician Fee Schedule, CPT code 99116 is payable; this applies to EH Medicaid plans only*

Multiple or Duplicate Anesthesia Services:

Multiple Anesthesia Services:

According to the ASA, when multiple surgical procedures are performed during a single anesthesia administration, only the single anesthesia code with the highest Base Unit Value is reported. The time reported is the combined total for all procedures performed on the same patient on the same date of service by the same or different physician or other qualified health care professional. Add-on anesthesia codes (01953, 01968 and 01969) are exceptions to this and are addressed in the Anesthesia Services section and Obstetric Anesthesia Services section of this policy. EmblemHealth aligns with these ASA coding guidelines. Specific reimbursement percentages are based on the anesthesia modifier(s) reported.

Duplicate Anesthesia Services:

When duplicate (same) anesthesia codes are reported by the same or different physician or other qualified health care professional for the same patient on the same date of service, EmblemHealth will only reimburse the first submission of that code. However, anesthesia administration services can be rendered simultaneously by an MD and a CRNA during the same operative session, each receiving 50% of the Allowed Amount (as indicated in the Modifier Table above) by reporting modifiers QK or QY and QX.

In the event an anesthesia administration service is provided during a different operative session on the same day as a previous operative session, EmblemHealth will reimburse one additional anesthesia administration appended with modifier 59, 76, 77, 78, 79 or XE. As with the initial anesthesia administration, only the single anesthesia code with the highest Base Unit Value should be reported.

Anesthesia and Procedural Bundled Services:

EmblemHealth sources anesthesia edits to methodologies used and recognized by third party authorities (referenced in the Overview section) when considering procedural or pain management services that are an integral part of anesthesia services, and anesthesia services that are an integral part of procedural services. Those methodologies can be Definitive or Interpretive. A Definitive source is one that is based on very specific instructions from the given source. An Interpreted source is one that is based on an interpretation of instructions from the identified source.



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Procedural/pain management services or anesthesia services that are identified as bundled (integral) are not separately reimbursable when performed by the Same Individual Physician or Other Qualified Health Care Professional on the same date of service. The Same Individual Physician or Other Qualified Health Care Professional is defined as the same individual rendering health care services reporting the same Federal Tax Identification number.

Procedural or Pain Management Services Bundled in Anesthesia Services:

- Services in the CMS National Physician Fee Schedule that have a status indicator of B (Bundled code), Status N or T (Injections);
- Nerve Block codes billed in conjunction with anesthesia services when modifier 59, XE or XU is not appended to the nerve block code.

Anesthesia Services Bundled in Procedural Services:

According to the NCCI Policy Manual, Chapter 1, CMS does not allow separate payment for anesthesia services performed by the physician who also furnishes the medical or surgical procedure, excluding Moderate Sedation. In these situations, the allowance for the anesthesia service is included in the payment for the medical or surgical procedure. In addition, AMA states “if a physician personally performs the regional or general anesthesia for a surgical procedure that he or she also performs, modifier 47 would be appended to the surgical code, and no codes from the anesthesia section would be used.”

EmblemHealth will not separately reimburse an anesthesia service when reported with a medical or surgical procedure (where the anesthesia service is the direct or alternate crosswalk code for the medical or surgical procedure) submitted by the Same Individual Physician or Other Qualified Health Care Professional for the same patient on the same date of service.

Preoperative/Postoperative Visits:

Consistent with CMS, EmblemHealth will not separately reimburse an E/M service (excluding critical care CPT® codes 99291-99292) when reported by the Same Specialty Physician or Other Qualified Health Care Professional on the same date of service as an anesthesia service.

Critical care CPT® codes 99291-99292 are not considered included in an anesthesia service and will be separately reimbursed.

The Same Specialty Physician or Other Qualified Health Care Professional is defined as physicians and/or other qualified health care professionals of the same group and same specialty reporting the same Federal Tax Identification number.



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Daily Hospital Management:

Daily hospital management of epidural or subarachnoid drug administration (CPT® code 01996) in a CMS place of service 19 (off campus outpatient hospital), 21 (inpatient hospital), 22 (on campus outpatient hospital) or 25 (birthing center) is a separately reimbursable service once per date of service excluding the day of insertion. CPT® code 01996 is considered included in the pain management procedure if submitted on the same date of service by the Same Individual Physician or Other Qualified Health Care Professional.

If the anesthesiologist continues with the patient's care after discharge, the appropriate Evaluation and Management code should be used.

Neuraxial Labor Analgesia Reimbursement Calculations:

Consistent with a method described in the ASA RVG® EmblemHealth will reimburse neuraxial labor analgesia (CPT® code 01967) based on Base Unit Value plus Time Units subject to a reasonable cap of 435 minutes. Modifying Units for physical status modifiers and qualifying circumstance codes will be considered in addition to the Base Unit Value for labor or delivery anesthesia services in accordance with the Standard Anesthesia Formula.

Obstetric Add-On Codes:

EmblemHealth will consider for reimbursement, add-on CPT® codes 01968 and 01969 (c- section anesthesia) when billed with the primary CPT® code 01967 (by the same or different individual physician or other qualified healthcare professional) for the same member. According to the ASA Crosswalk® time for add-on code 01968 or 01969 is reported separately as a surgical anesthesia service and is not added to the time reported for the labor anesthesia service. Additionally, all add-on services must be reported with the date of service that is consistent with the date of service of the primary CPT code 01967.

Revision History

Company(ies)	DATE	REVISION
EmblemHealth	10/10/2025	<ul style="list-style-type: none"> Transferred policy content to individual company-branded template. No changes to policy title or policy number.
EmblemHealth ConnectiCare	2/2024	<ul style="list-style-type: none"> Updated 'Billing Instructions' with clarifying language regarding multiple anesthesia sessions on the same date of service.



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EmblemHealth ConnectiCare	10/2022	<ul style="list-style-type: none"> Updated “Policy Overview” section to include/clarify time-based exception when reporting 01953 and 01996.
EmblemHealth ConnectiCare	4/2022	<ul style="list-style-type: none"> Updated “Obstetric Add-On Codes” section to clarify that all add-on services must be reported with the date of service that is consistent with the date of service of the primary CPT Code 01967.
EmblemHealth ConnectiCare	11/2021	<ul style="list-style-type: none"> Reformatted and reorganized policy, transferred content to new template with new Reimbursement Policy Number
EmblemHealth	8/25/2021	<ul style="list-style-type: none"> Added clarification that services appended with Physical Status (P) Modifiers are not eligible for reimbursement for both EmblemHealth Medicare and Medicaid plans
EmblemHealth	12/10/2020	<ul style="list-style-type: none"> Added parenthetical note on NYS Medicaid coverage of CPT code 99116
EmblemHealth ConnectiCare	10/05/2020	<ul style="list-style-type: none"> Aligned with ASA guidelines to support a maximum payment cap of 435 minutes for Neuraxial Labor Anesthesia. Removed Obstetric Anesthesia Services section.
EmblemHealth ConnectiCare	8/18/2020	<ul style="list-style-type: none"> Removed anesthesia billing instruction to add Base Unit Value to total anesthesia units. Amended Obstetric Anesthesia Services