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May 12, 2020

Earl Berman, MD
Chief Medical Officer, J15 A/B MAC
CGS Administrators, LLC
Two Vantage Way
Nashville, TN 37228
SENT VIA EMAIL: cmd.inquiry@cgsadmin.com

Dear Dr. Berman,

I am contacting you on behalf of the American Academy of Sleep Medicine (AASM), the premiere membership organization for sleep professionals and centers. The AASM is a membership organization representing over 10,000 sleep medicine practitioners and sleep centers.

Several AASM members recently alerted AASM to concerns about the diagnosis coding included in the [Local Coverage Article: Billing and Coding: Polysomnography and Other Sleep Studies](#), as it does not include the diagnosis code R06.83 – Snoring in the list of ICD-10 Codes that Support Medical Necessity for the Group 1 CPT/HCPCS Codes. The third edition of the International Classification of Sleep Disorders (ICSD-3) defines obstructive sleep apnea (OSA) as a PSG-determined obstructive respiratory disturbance index (RDI) ≥ 5 events/h associated with the typical symptoms of OSA (e.g., unrefreshing sleep, daytime sleepiness, fatigue or insomnia, awakening with a gasping or choking sensation, loud snoring, or witnessed apneas), or an obstructive RDI ≥ 15 events/h (even in the absence of symptoms)¹. As such, the AASM feels strongly that the diagnosis code for snoring should be added to the billing and coding local coverage article, as this symptom may be documented during a patient’s comprehensive sleep evaluation and may lead to an order for a diagnostic sleep study.

Additionally, while we are aware of the changes to the LCD reconsideration process, we are unaware of an existing process for requesting changes to supporting documents, including Local Coverage Articles. Please advise if there is a different process that should be followed, in submitting the request for this change.

We appreciate your consideration of including the additional code in the Local Coverage Article. If you have any questions about this issue or require any additional information, please contact AASM Director of Health Policy, Diedra Gray, at (630) 737-9700 or dgray@aasm.org.

Sincerely,

Kelly A. Carden, MD, MBA
AASM President

ⁱ American Academy of Sleep Medicine International Classification of Sleep Disorders, 3rd ed Darien, IL: American Academy of Sleep Medicine; 2014.