CMS Manual System Pub. 100-04 Medicare Claims Processing Transmittal 37 Department of Health & Human Services (DHHS) Centers for Medicare & Medicaid Services (CMS) Date: DECEMBER 8, 2003

CHANGE REQUEST 2970

I. SUMMARY OF CHANGES: This section is being changed to add place of service (POS) code 42 to Field 29, it also adds item 38B, which was inadvertently left out by the contractor, and adds the year 2004 to field 8 Conversion Factor.

NEW/REVISED MATERIAL – EFFECTIVE DATE: January 1, 2004 *IMPLEMENTATION DATE: January 5, 2004

Disclaimer for manual changes only: The revision date and transmittal number apply only to red italicized material. Any other material was previously published and remains unchanged.

II. CHANGES IN MANUAL INSTRUCTIONS: (R = REVISED, N = NEW, D = DELETED)

R/N/D	CHAPTER/SECTION/SUBSECTION/TITLE
R	23/Table of Contents
N	23/Addendum – MPFSDB Record Layout

III. FUNDING: *Medicare contractors only:

These instructions should be implemented within your current operating budget.

IV. ATTACHMENTS:

X	Business Requirements
X	Manual Instruction
	Confidential Requirements
	One-Time Special Notification

Business Requirements

Pub. 100-04 | Transmittal: 37 | Date: December 8, 2003 | Change Request 2970

I. GENERAL INFORMATION

- **A. Background:** The Medicare physician fee schedule database (MPFSDB) is the file layout for carriers. It includes the total fee schedule amount, related component parts, and payment policy indicators.
- **B. Policy:** Corrects CR 2898, Transmittal 1820. This instruction adds place of service 42 to Field 29 which was inadvertently left out of CR 2898. A few other changes were made since some information had been "dropped" from CR 2898.
- C. Provider Education: None

II. BUSINESS REQUIREMENTS

[&]quot;Shall" denotes a mandatory requirement "Should" denotes an optional requirement

Requirement #	Requirements	Responsibility
Chapter 23,	Carriers <i>shall</i> recognize the new 2004	Carriers
Addendum	MPFSDB file layout.	

III. SUPPORTING INFORMATION AND POSSIBLE DESIGN CONSIDERATIONS

A. Other Instructions: N/A

X-Ref Requirement #	Instructions

B. Design Considerations: N/A

X-Ref Requirement #	Recommendation for Medicare System Requirements

C. Interfaces: N/A

D. Contractor Financial Reporting /Workload Impact: N/A

E. Dependencies: N/A

F. Testing Considerations: N/A

IV. OTHER CHANGES N/A

Citation	Change

SCHEDULE, CONTACTS, AND FUNDING

Effective Date: January 1, 2004	These instructions should be
Implementation Date: January 5, 2004	implemented within your current operating budget
Post-Implementation Contact(s): Vera Dillard (410) 786-6149	

Medicare Claims Processing Manual

Chapter 23 - Fee Schedule Administration and Coding Requirements

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Addendum - MPFSDB Record Layouts

2001 File Layout

2002 File Layout

2003 File Layout

2004 File Layout

2004 File Layout

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HEADER RECORD

FIELD #	DATA ELEMENT NAME	LOCATION	PIC
1	Header ID	1-4	x(4) Value "Head"
2	Header Number	5	x(1)
3	Data Set Name	6-50	x(45)
4	Record Length	51-53	x(3)
5	Filler	54-54	x(1)
6	Block size	55-58	x(4)
7	Filler	59-59	x(1)
8	Number of Records Number does not include this header record.	60-69	9(10)
9	Date Created	70-77	x(8) YYYYMMDD
10	Blanks	78-345	x(268)

FILE LAYOUT

FIELD # & ITEM	LENGTH & PIC
1	4 Pic x(4)
File Year	
This field displays the effective year of the file.	
2	5 Pic x(5)
Carrier Number	
This field represents the 5-digit number assigned to the carrier.	
3	$2 \operatorname{Pic} x(2)$
Locality	
This 2-digit code identifies the pricing locality used.	
4	5 Pic x(5)
HCPCS Code	
This field represents the procedure code. Each Carrier Procedural Terminology (CPT) code and alpha-numeric HCPCS codes other than B, C, E, K and L codes and services representing anesthesia services will be included. The standard sort for this field is blanks, alpha, and numeric in ascending order.	
5	$2 \operatorname{Pic} x(2)$
Modifier	

FIELD # & ITEM	LENGTH & PIC
For diagnostic tests, a blank in this field denotes the global service and the following modifiers identify the components:	
26 = Professional component	
TC = Technical component	
For services other than those with a professional and/or technical component, a blank will appear in this field with one exception: the presence of CPT modifier -53 which indicates that separate Relative Value Units (RVUs) and a fee schedule amount have been established for procedures which the physician terminated before completion. This modifier is used only with colonoscopy code 45378 and screening colonoscopy codes G0105 and G0121. Any other codes billed with modifier -53 are subject to carrier medical review and priced by individual consideration.	
Modifier-53 = Discontinued Procedure - Under certain circumstances, the physician may elect to terminate a surgical or diagnostic procedure. Due to extenuating circumstances, or those that threaten the well being of the patient, it may be necessary to indicate that a surgical or diagnostic procedure was started but discontinued.	
6	<i>50 Pic x(50)</i>
Descriptor	
This field will include a brief description of each procedure code.	
7	$1 \operatorname{Pic} x(1)$
Code Status	
This 1 position field provides the status of each code under the full fee schedule. Each status code is explained in §30.2.3.	
8	8 Pic 9(4)v9999
Conversion Factor	
This field displays the multiplier which transforms relative values into payment amounts. The file will contain the 2004 conversion factor which will reflect all adjustments.	
9	6 Pic 9(2)v9999
Update Factor	
This update factor has been included in the conversion factor in Field 8.	
10	9 Pic 9(7)v99
Work Relative Value Unit	
This field displays the unit value for the physician work RVU.	
11	9 Pic 9(7)v99

FIELD # & ITEM	LENGTH & PIC
Filler	
12	9 Pic 9(7)v99
Malpractice Relative Value Unit	
This field displays the unit value for the malpractice expense RVU.	
13	5 Pic 99v999
Work Geographic Practice Cost Indices (GPCIs)	
This field displays a work geographic adjustment factor used in computing the fee schedule amount.	
14	5 Pic 99v999
Practice Expense GPCI	
This field displays a practice expense geographic adjustment factor used in computing the fee schedule amount.	
15	5 Pic 99v999
Malpractice GPCI	
This field displays a malpractice expense geographic adjustment factor used in computing the fee schedule amount.	
16	<i>3 Pic x(3)</i>
Global Surgery	
This field provides the postoperative time frames that apply to payment for each surgical procedure or another indicator that describes the applicability of the global concept to the service.	
000 = Endoscopic or minor procedure with related preoperative and postoperative relative values on the day of the procedure only included in the fee schedule payment amount; evaluation and management services on the day of the procedure generally not payable.	
010 = Minor procedure with preoperative relative values on the day of the procedure and postoperative relative values during a 10-day postoperative period included in the fee schedule amount; evaluation and management services on the day of the procedure and during this 10-day postoperative period generally not payable.	
090 = Major surgery with a 1-day preoperative period and 90-day postoperative period included in the fee schedule payment amount.	
MMM = Maternity codes; usual global period does not apply.	
$XXX = Global \ concept \ does \ not \ apply.$	
YYY = Carrier determines whether global concept applies and establishes postoperative period, if appropriate, at time of pricing.	
ZZZ = Code related to another service and is always included in the	

FIELD # & ITEM	LENGTH & PIC
global period of the other service. (Note: Physician work is associated with intra-service time and in some instances the post service time.)	
17	6 Pic 9v9(5)
Preoperative Percentage (Modifier 56)	
This field contains the percentage (shown in decimal format) for the preoperative portion of the global package. For example, 10 percent will be shown as 0.1000. The total of fields 17, 18, and 19 will usually equal one. Any variance is slight and results from rounding.	
18	6 Pic 9v9(5)
Intraoperative Percentage (Modifier 54)	
This field contains the percentage (shown in decimal format) for the intraoperative portion of the global package including postoperative work in the hospital. For example, 63 percent will be shown as 0.6300. The total of fields 17, 18, and 19 will usually equal one. Any variance is slight and results from rounding.	
19	6 Pic 9v9(5)
Postoperative Percentage (Modifier 55)	
This field contains the percentage (shown in decimal format) for the postoperative portion of the global package that is provided in the office after discharge from the hospital. For example, 17 percent will be shown as 0.1700. The total of fields 17, 18, and 19 will usually equal one. Any variance is slight and results from rounding.	
20	$1 \operatorname{Pic} x(1)$
Professional Component (PC)/Technical Component (TC) Indicator	
0 = Physician service codes: This indicator identifies codes that describe physician services. Examples include visits, consultations, and surgical procedures. The concept of PC/TC does not apply since physician services cannot be split into professional and technical components. Modifiers 26 & TC cannot be used with these codes. The total Relative Value Units (RVUs) include values for physician work, practice expense and malpractice expense. There are some codes with no work RVUs.	
1 = Diagnostic tests or radiology services: This indicator identifies codes that describe diagnostic tests, e.g., pulmonary function tests, or therapeutic radiology procedures, e.g., radiation therapy. These codes generally have both a professional and technical component. Modifiers 26 and TC can be used with these codes.	
The total RVUs for codes reported with a 26 modifier include values for physician work, practice expense, and malpractice expense.	

FIELD # & ITEM LENGTH & PIC

The total RVUs for codes reported with a TC modifier include values for practice expense and malpractice expense only. The total RVUs for codes reported without a modifier equals the sum of RVUs for both the professional and technical component.

2 = Professional component only codes: This indicator identifies stand alone codes that describe the physician work portion of selected diagnostic tests for which there is an associated code that describes the technical component of the diagnostic test only and another associated code that describes the global test.

An example of a professional component only code is 93010, Electrocardiogram; interpretation and report. Modifiers 26 and TC cannot be used with these codes. The total RVUs for professional component only codes include values for physician work, practice expense, and malpractice expense.

3 = Technical component only codes: This indicator identifies stand alone codes that describe the technical component (i.e., staff and equipment costs) of selected diagnostic tests for which there is an associated code that describes the professional component of the diagnostic tests only.

An example of a technical component code is 93005, Electrocardiogram, tracing only, without interpretation and report. It also identifies codes that are covered only as diagnostic tests and therefore do not have a related professional code. Modifiers 26 and TC cannot be used with these codes.

The total RVUs for technical component only codes include values for practice expense and malpractice expense only.

- 4 = Global test only codes: This indicator identifies stand alone codes for which there are associated codes that describe: a) the professional component of the test only and b) the technical component of the test only. Modifiers 26 and TC cannot be used with these codes. The total RVUs for global procedure only codes include values for physician work, practice expense, and malpractice expense. The total RVUs for global procedure only codes equals the sum of the total RVUs for the professional and technical components only codes combined.
- 5 = Incident to codes: This indicator identifies codes that describe services covered incident to a physicians service when they are provided by auxiliary personnel employed by the physician and working under his or her direct supervision.

Payment may not be made by carriers for these services when they are provided to hospital inpatients or patients in a hospital outpatient department. Modifiers 26 and TC cannot be used with

FIELD # & ITEM	LENGTH & PIC
these codes.	
6 = Laboratory physician interpretation codes: This indicator identifies clinical laboratory codes for which separate payment for interpretations by laboratory physicians may be made. Actual performance of the tests is paid for under the lab fee schedule. Modifier TC cannot be used with these codes. The total RVUs for laboratory physician interpretation codes include values for physician work, practice expense and malpractice expense.	
7 = Physical therapy service: Payment may not be made if the service is provided to either a hospital outpatient or inpatient by an independently practicing physical or occupational therapist.	
8 = Physician interpretation codes: This indicator identifies the professional component of clinical laboratory codes for which separate payment may be made only if the physician interprets an abnormal smear for hospital inpatient. This applies only to code 85060. No TC billing is recognized because payment for the underlying clinical laboratory test is made to the hospital, generally through the PPS rate.	
No payment is recognized for code 85060 furnished to hospital outpatients or non-hospital patients. The physician interpretation is paid through the clinical laboratory fee schedule payment for the clinical laboratory test.	
9 = Concept of a professional/technical component does not apply.	
21	1 Pic (x)1
Multiple Procedure (Modifier 51)	
Indicator indicates which payment adjustment rule for multiple procedures applies to the service.	
0 = No payment adjustment rules for multiple procedures apply. If procedure is reported on the same day as another procedure, base payment on the lower of: (a) the actual charge or (b) the fee schedule amount for the procedure.	
1 = Standard payment adjustment rules in effect before January 1, 1996, or multiple procedures apply. In the 1996 MPFSDB, this indicator only applies to codes with procedure status of "D." If a procedure is reported on the same day as another procedure with an indicator of 1,2, or 3, rank the procedures by fee schedule amount and apply the appropriate reduction to this code (100 percent, 50 percent, 25 percent, 25 percent, 25 percent, and by report). Base payment on the lower of: (a) the actual charge or (b) the fee schedule amount reduced by the appropriate percentage.	
2 = Standard payment adjustment rules for multiple procedures apply. If procedure is reported on the same day as another	

FIELD # & ITEM	LENGTH & PIC
procedure with an indicator of 1, 2, or 3, rank the procedures by fee schedule amount and apply the appropriate reduction to this code (100 percent, 50 percent, 50 percent, 50 percent, and by report). Base payment on the lower of: (a) the actual charge or (b) the fee schedule amount reduced by the appropriate percentage.	
3 = Special rules for multiple endoscopic procedures apply if procedure is billed with another endoscopy in the same family (i.e., another endoscopy that has the same base procedure). The base procedure for each code with this indicator is identified in field 31G.	
Apply the multiple endoscopy rules to a family before ranking the family with other procedures performed on the same day (for example, if multiple endoscopies in the same family are reported on the same day as endoscopies in another family or on the same day as a non-endoscopic procedure).	
If an endoscopic procedure is reported with only its base procedure, do not pay separately for the base procedure. Payment for the base procedure is included in the payment for the other endoscopy.	
4 = Indicator is reserved for possible future use.	
9 = Concept does not apply.	
22	1 Pic (x)1
Bilateral Surgery Indicator (Modifier 50)	
This field provides an indicator for services subject to a payment adjustment.	
0 = 150 percent payment adjustment for bilateral procedures does not apply. If procedure is reported with modifier -50 or with modifiers RT and LT, base payment for the two sides on the lower of: (a) the total actual charge for both sides or (b) 100 percent of the fee schedule amount for a single code. Example: The fee schedule amount for code XXXXX is \$125. The physician reports code XXXXX-LT with an actual charge of \$100 and XXXXX-RT with an actual charge of \$100.	
Payment would be based on the fee schedule amount (\$125) since it is lower than the total actual charges for the left and right sides (\$200).	
The bilateral adjustment is inappropriate for codes in this category because of (a) physiology or anatomy or (b) because the code descriptor specifically states that it is a unilateral procedure and there is an existing code for the bilateral procedure.	
l=150 percent payment adjustment for bilateral procedures applies. If code is billed with the bilateral modifier or is reported twice on the same day by any other means (e.g., with RT and LT modifiers or with a 2 in the units field), base payment for these codes	

FIELD # & ITEM LENGTH & PIC

when reported as bilateral procedures on the lower of: (a) the total actual charge for both sides or (b) 150 percent of the fee schedule amount for a single code.

If code is reported as a bilateral procedure and is reported with other procedure codes on the same day, apply the bilateral adjustment before applying any applicable multiple procedure rules.

2 = 150 percent payment adjustment for bilateral procedure does not apply. RVUs are already based on the procedure being performed as a bilateral procedure. If procedure is reported with modifier -50 or is reported twice on the same day by any other means (e.g., with RT and LT modifiers with a 2 in the units field), base payment for both sides on the lower of (a) the total actual charges by the physician for both sides or (b) 100 percent of the fee schedule amount for a single code.

Example: The fee schedule amount for code YYYYY is \$125. The physician reports code YYYYY?LT with an actual charge of \$100 and YYYYY-RT with an actual charge of \$100. Payment would be based on the fee schedule amount (\$125) since it is lower than the total actual charges for the left and right sides (\$200).

The RVUs are based on a bilateral procedure because: (a) the code descriptor specifically states that the procedure is bilateral; (b) the code descriptor states that the procedure may be performed either unilaterally or bilaterally; or (c) the procedure is usually performed as a bilateral procedure.

3 = The usual payment adjustment for bilateral procedures does not apply. If procedure is reported with modifier -50 or is reported for both sides on the same day by any other means (e.g., with RT and LT modifiers or with a 2 in the units field), base payment for each side or organ or site of a paired organ on the lower of: (a) the actual charge for each side or (b) 100% of the fee schedule amount for each side. If procedure is reported as a bilateral procedure and with other procedure codes on the same day, determine the fee schedule amount for a bilateral procedure before applying any applicable multiple procedure rules.

Services in this category are generally radiology procedures or other diagnostic tests which are not subject to the special payment rules for other bilateral procedures.

9 = Concept does not apply.

FIELD # & ITEM	LENGTH & PIC
23	1 Pic (x)1
Assistant at Surgery	
This field provides an indicator for services where an assistant at surgery is never paid for per MCM.	
0 = Payment restriction for assistants at surgery applies to this procedure unless supporting documentation is submitted to establish medical necessity.	
I = Statutory payment restriction for assistants at surgery applies to this procedure. Assistant at surgery may not be paid.	
2 = Payment restriction for assistants at surgery does not apply to this procedure. Assistant at surgery may be paid.	
9 = Concept does not apply.	
24	1 Pic (x)1
Co-Surgeons (Modifier 62)	
This field provides an indicator for services for which two surgeons, each in a different specialty, may be paid.	
0 = Co-surgeons not permitted for this procedure.	
I = Co-surgeons could be paid; supporting documentation required to establish medical necessity of two surgeons for the procedure.	
2 = Co-surgeons permitted; no documentation required if two specialty requirements are met.	
9 = Concept does not apply.	
25	1 Pic (x)1
Team Surgeons (Modifier 66)	
This field provides an indicator for services for which team surgeons may be paid.	
0 = Team surgeons not permitted for this procedure.	
I = Team surgeons could be paid; supporting documentation required to establish medical necessity of a team; pay by report.	
2 = Team surgeons permitted; pay by report.	
9 = Concept does not apply.	
26	1 Pic (x)1
Filler	
27	1 Pic (x)1
Site of Service Differential	
For 1999 and beyond, the site of service differential no longer applies. The following definitions will apply for all years after	

FIELD # & ITEM	LENGTH & PIC
1998:	
0 = Facility pricing does not apply.	
I = Facility pricing applies.	
28	9 Pic 9(7)v99
Non-Facility Fee Schedule Amount	
This field shows the fee schedule amount for the non-facility setting. This amount equals Field 34.	
Non-Facility Pricing Amount	
[(Work RVU * Work GPCI) +	
(Non-Facility PE RB RVU * PE GPCI) +	
(MP RVU * MP GPCI)] * Conversion Factor	
29	9 Pic 9(7)v99
Facility Fee Schedule Amount	
This field shows the fee schedule amount for the facility setting. This amount equals Field 35.	
Facility Pricing Amount	
[(Work RVU * Work GPCI) +	
(Facility PE RB RVU * PE GPCI) +	
(MP RVU * MP GPCI)] * Conversion Factor	
Place of service codes to be used to identify facilities.	
21 - Inpatient Hospital	
22 - Outpatient Hospital	
23 - Emergency Room - Hospital	
24 - Ambulatory Surgical Center - ASC is only treated as a facility setting when an ASC list procedure is performed in an ASC.	
26 - Military Treatment Facility	
31 - Skilled Nursing Facility	
34 - Hospice	
41 - Ambulance - Land	
42 - Ambulance Air or Water	
51 - Inpatient Psychiatric Facility	
52 - Psychiatric Facility Partial Hospitalization	
53 - Community Mental Health Center	
56 - Psychiatric Residential Treatment Facility	
61 - Comprehensive Inpatient Rehabilitation Facility	

FIELD # & ITEM	LENGTH & PIC
30	2 Pic 99
Number of Related Codes	
This field defines the number of related procedure codes (see Field	
31).	
31	65 Pic x(5) -
Related Procedure Codes	Occurs 13 times
This field identifies the number of times that a related code occurs.	
31A	$2 \operatorname{Pic} x(2)$
Physician Supervision of Diagnostic Procedures	
This field is for use in post payment review.	
01 = Procedure must be performed under the general supervision of a physician.	
02 = Procedure must be performed under the direct supervision of a physician.	
03 = Procedure must be performed under the personal supervision of a physician.	
04 = Physician supervision policy does not apply when procedure is furnished by a qualified, independent psychologist or a clinical psychologist; otherwise must be performed under the general supervision of a physician.	
05 = Physician supervision policy does not apply when procedure is furnished by a qualified audiologist; otherwise must be performed under the general supervision of a physician.	
06 = Procedure must be performed by a physician or a physical therapist (PT) who is certified by the American Board of Physical Therapy Specialties (ABPTS) as a qualified electrophysiologic clinical specialist and is permitted to provide the procedure under State law.	
21 = Procedure may be performed by a technician with certification under general supervision of a physician; otherwise must be performed under direct supervision of a physician.	
22 = May be performed by a technician with on-line real-time contact with physician.	
66 = May be performed by a physician or by a physical therapist with ABPTS certification and certification in this specific procedure.	
6A = Supervision standards for level 66 apply; in addition, the PT with ABPTS certification may supervise another PT, but only the PT with ABPTS certification may bill.	
77 = Procedure must be performed by a PT with ABPTS	

FIELD # & ITEM	LENGTH & PIC
certification or by a PT without certification under direct supervision of a physician, or by a technician with certification under general supervision of a physician.	
7A = Supervision standards for level 77 apply; in addition, the PT with ABPTS certification may supervise another PT, but only the PT with ABPTS certification may bill.	
09 = Concept does not apply.	
31B	
This filed has been deleted to allow for the expansion of field 31A.	
31C Facility Setting Practice Expense Relative Value Units	9 Pic(7)v99
31D	9 Pic(7)v99
Non-Facility Setting Practice Expense Relative Value Units	
31E	9 Pic(7)v99
Filler	
31F	1 Pic x(1)
Filler	
Reserved for future use.	
31G	5 Pic x(5)
Endoscopic Base Codes	
This field identifies an endoscopic base code for each code with a multiple surgery indicator of 3.	
<i>32A</i>	9 Pic 9(7)v99
1996 Transition/Fee Schedule Amount	
This field is no longer applicable since transitioning ended in 1996. This field will contain a zero.	
32B	$1 \operatorname{Pic} x(1)$
1996 Transition/Fee Schedule	
This field is no longer Indicator applicable since transitioning ended in 1996. This field will contain spaces.	
32C	9 Pic 9(7)v99
1996 Transition/Fee Schedule Amount When Site or Service Differential Applies	
This field is no longer applicable since transitioning ended in 1996. This field will contain a zero.	
33A	1 Pic x(1)
Units Payment Rule Indicator	

FIELD # & ITEM	LENGTH & PIC
Reserved for future use.	
9 = Concept does not apply.	
33B	$1 \operatorname{Pic} x(1)$
Mapping Indicator	
This field is no longer applicable since transitioning ended in 1996. This field will contain spaces.	
33C	2 Pic x(2)
Medicare+Choice Encounter Pricing Locality	
NOT FOR CARRIER USE: These Medicare+Choice encounter pricing localities are for EDS purposes only. The locality values were developed to facilitate centralized processing of encounter data by the Medicare+Choice organizations (M+COs).	
33D	7 <i>Pic x</i> (7)
National Level Future Expansion	
This field is being provided for future expansion at the national level.	

FIELD # & ITEM	LENGTH & PIC
34	9 Pic 9(7)v99
Non-Facility Fee Schedule Amount	
This field replicates field 28.	
35	9 Pic 9(7)v99
Facility Fee Schedule Amount	
This field replicates field 29.	
36	$1 \operatorname{Pic} x(1)$
Filler	
37	7 Pic x(7)
Future Local Level Expansion**	
The Updated 1992 Transition Amount was previously stored in this field. Carriers can continue to maintain the updated transition amount in this field.	
38A	7 Pic x(7)
Future Local Level Expansion**	
The adjusted historical payment basis (AHPB) was previously stored in this field. Carriers can continue to maintain the AHPB in this field.	
38 B	8 Pix x(8)
Filler	
This field was originally established for 15 spaces. Since AHPB data will only use 7 of the 15 spaces, carriers have 8 remaining spaces for their purposes.	
* These fields will be provided by CMS in the 2004 Medicare Fee Schedule Data base for codes with status code indicator A and T, as well as, indicators D and R with associate RVUs. Carriers will be responsible for calculating the 2004 payment amounts for codes with status code indicator of C, L, and R for codes without associated RVUs.	
** These fields will be appended by each carrier at the local level.	