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October 13, 2021

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SENT VIA EMAIL: [arthur.lurvey@noridian.com](mailto:arthur.lurvey@noridian.com),  
[eileen.moynihan@noridian.com](mailto:eileen.moynihan@noridian.com)

Dear Drs., Lurvey and Moynihan,

I am contacting you on behalf of the American Academy of Sleep Medicine (AASM), a professional medical society that represents over 10,000 sleep medicine clinicians and sleep centers and is dedicated to advancing sleep care and enhancing sleep health to improve lives.

An AASM member recently notified AASM of their concerns regarding the Home Sleep Apnea Test (HSAT) coding and billing language included in the [Local Coverage Article: Billing and Coding: Polysomnography and Other Sleep Studies, effective, December 1, 2019](#). The Group 4 Paragraph within the Local Coverage Article specifically states, “CPT codes 95800, 95801, and 95806 will be allowed when performed in a facility...,” which is counter to the purpose of an HSAT. An HSAT is an at-home, unattended medical diagnostic assessment for the detection of sleep apnea and other sleep breathing disorders. While AASM members understand that there are some rare instances in which HSATs are performed in facilities, HSATs are usually performed in the home. Therefore, the AASM urges *Noridian, LLC* to revise the language contained in this Local Coverage Article to state that “CPT codes 95800, 95801, and 95806 will be allowed when performed in a home,” with a caveat that these codes may be reported in a facility setting in some instances OR simply change the language to “CPT codes 95800, 95801, and 95806 will be allowed when performed in the home or facility...,” so the intent of the codes is clear.

While we are aware of the recent changes to the LCD reconsideration process, we are unacquainted with an existing process for requesting changes to supporting documents. Please advise if there is a separate process for submitting requests for changes to Local Coverage Articles, which should be followed.

AASM appreciates your consideration of this request to revise the language included in this 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](mailto:dgray@aasm.org).

Sincerely,

Raman Malhotra, MD  
*AASM President*