



## Measure Information

This document contains the information submitted by measure developers/stewards, but is organized according to NQF's measure evaluation criteria and process. The item numbers refer to those in the submission form but may be in a slightly different order here. In general, the item numbers also reference the related criteria (e.g., item 1b.1 relates to subcriterion 1b).

### Brief Measure Information

**NQF #:** 1854

**De.2. Measure Title:** Barrett's Esophagus

**Co.1.1. Measure Steward:** College of American Pathologists

**De.3. Brief Description of Measure:** Percentage of patients with esophageal biopsy reports for Barrett's esophagus that contain a statement about dysplasia and if present the grade of dysplasia.

**1b.1. Developer Rationale:** The measure is intended to ensure better diagnosis and communication of results by pathologists for better surveillance of Barrett's esophagus.

**S.4. Numerator Statement:** Numerator: Esophageal biopsy reports with the histologic finding of Barrett's mucosa that contain a statement about dysplasia (present, absent, or indefinite; and if present, contains appropriate grading.)

3125F Esophageal biopsy report with a statement about dysplasia (present, absent, or indefinite)

**S.7. Denominator Statement:** Denominator (Eligible Population): All esophageal biopsy reports that document the presence of Barrett's mucosa.

CPT codes:

- 88305 Level IV – Surgical pathology, gross and microscopic examination

AND

?ICD-10 codes: K22.70, K22.710, K22.711, K22.719

**S.10. Denominator Exclusions:** Documentation of medical reason for not reporting the histologic finding of Barrett's mucosa (eg, malignant neoplasm or absence of intestinal metaplasia).

**De.1. Measure Type:** Outcome

**S.23. Data Source:** Administrative claims, Other, Paper Medical Records

**S.26. Level of Analysis:** Clinician : Group/Practice, Clinician : Individual

**IF Endorsement Maintenance – Original Endorsement Date:** Aug 09, 2012 **Most Recent Endorsement Date:** Aug 09, 2012

**IF this measure is included in a composite, NQF Composite#/title:**

**IF this measure is paired/grouped, NQF#/title:**

**De.4. IF PAIRED/GROUPED, what is the reason this measure must be reported with other measures to appropriately interpret results?**

### 1. Evidence, Performance Gap, Priority – Importance to Measure and Report

Extent to which the specific measure focus is evidence-based, important to making significant gains in healthcare quality, and improving health outcomes for a specific high-priority (high-impact) aspect of healthcare where there is variation in or overall less-than-optimal performance. **Measures must be judged to meet all subcriteria to pass this criterion and be evaluated against the remaining criteria.**

**1a. Evidence to Support the Measure Focus – See attached Evidence Submission Form**

[1854\\_Evidence\\_MSF5.0\\_Data.doc](#)

**1b. Performance Gap**

Demonstration of quality problems and opportunity for improvement, i.e., data demonstrating:

- considerable variation, or overall less-than-optimal performance, in the quality of care across providers; and/or
- disparities in care across population groups.

**1b.1. Briefly explain the rationale for this measure (e.g., the benefits or improvements in quality envisioned by use of this measure)**

The measure is intended to ensure better diagnosis and communication of results by pathologists for better surveillance of Barrett's esophagus.

**1b.2. Provide performance scores on the measure as specified (current and over time) at the specified level of analysis.** *(This is required for endorsement maintenance. Include mean, std dev, min, max, interquartile range, scores by decile. Describe the data source including number of measured entities; number of patients; dates of data; if a sample, characteristics of the entities included). This information also will be used to address the subcriterion on improvement (4b.1) under Usability and Use.*

Ofman, et al note that there is room for improvement, particularly in the quality of biopsy methods. They note the importance of review of the data to minimize the risk of overdiagnosis and inadequate endoscopic surveillance.

The study by Curvers et al. emphasizes the importance of a pathologist's review for accurate diagnosis.

**1b.3. If no or limited performance data on the measure as specified is reported in 1b2, then provide a summary of data from the literature that indicates opportunity for improvement or overall less than optimal performance on the specific focus of measurement.**

1. Ofman, Joshua, J. M.D., The Quality of Care in Barrett's Esophagus: Endoscopist and Pathologist Practices (Am J Gastroenterol 2001;96: 876–881. © 2001 by Am. Coll. of Gastroenterology).

Curvers, Wouter L, etc, Quality of Barrett's Surveillance in the Netherlands: a standardized review of endoscopy and pathology reports. Am J Gastroenterol 2010; 105:1523–1530; doi: 10.1038/ajg.2010.171; published online 11 May 2010.

**1b.4. Provide disparities data from the measure as specified (current and over time) by population group, e.g., by race/ethnicity, gender, age, insurance status, socioeconomic status, and/or disability.** *(This is required for endorsement maintenance. Describe the data source including number of measured entities; number of patients; dates of data; if a sample, characteristics of the entities include.) This information also will be used to address the subcriterion on improvement (4b.1) under Usability and Use.*

Not applicable.

**1b.5. If no or limited data on disparities from the measure as specified is reported in 1b4, then provide a summary of data from the literature that addresses disparities in care on the specific focus of measurement. Include citations.**

Not applicable.

**1c. High Priority (previously referred to as High Impact)**

The measure addresses:

- a specific national health goal/priority identified by DHHS or the National Priorities Partnership convened by NQF; OR
- a demonstrated high-priority (high-impact) aspect of healthcare (e.g., affects large numbers of patients and/or has a substantial impact for a smaller population; leading cause of morbidity/mortality; high resource use (current and/or future); severity of illness; and severity of patient/societal consequences of poor quality).

**1c.1. Demonstrated high priority aspect of healthcare**

Affects large numbers, Frequently performed procedure, Patient/societal consequences of poor quality, Other

**1c.2. If Other:** Increasing incidence

**1c.3. Provide epidemiologic or resource use data that demonstrates the measure addresses a high priority aspect of healthcare. List citations in 1c.4.**

There is a rapidly rising incidence of adenocarcinoma of the esophagus in the United States. A diagnosis of Barrett's esophagus increases a patient's risk for esophageal adenocarcinoma by 30 to 125 times that of people without Barrett's esophagus (although

this risk is still small 0.4% to 0.5% per year). Esophageal adenocarcinoma is often not curable, partly because the disease is frequently discovered at a late stage and because treatments are not effective. A diagnosis of Barrett's esophagus could allow for appropriate screening of at risk patients as recommended by the American College of Gastroenterology .

**1c.4. Citations for data demonstrating high priority provided in 1a.3**

Sampliner RE and the practice parameters committee of the American College of Gastroenterology. Updated practice guidelines on the diagnosis, surveillance and therapy of Barrett's esophagus. Amer J Gastroentrol 97:1888-1895, 2002.

Barrett's Esophagus, National Digestive Diseases Information Clearinghouse, HHS [www.digestive.niddk.nih.gov](http://www.digestive.niddk.nih.gov)

**1c.5. If a PRO-PM (e.g. HRQoL/functional status, symptom/burden, experience with care, health-related behaviors), provide evidence that the target population values the measured PRO and finds it meaningful. (Describe how and from whom their input was obtained.)**

## 2. Reliability and Validity—Scientific Acceptability of Measure Properties

Extent to which the measure, as specified, produces consistent (reliable) and credible (valid) results about the quality of care when implemented. **Measures must be judged to meet the subcriteria for both reliability and validity to pass this criterion and be evaluated against the remaining criteria.**

**2a.1. Specifications** The measure is well defined and precisely specified so it can be implemented consistently within and across organizations and allows for comparability. eMeasures should be specified in the Health Quality Measures Format (HQMF) and the Quality Data Model (QDM).

**De.5. Subject/Topic Area** (check all the areas that apply):

Cancer, Cancer : Lung, Esophageal

**De.6. Cross Cutting Areas** (check all the areas that apply):

Care Coordination

**S.1. Measure-specific Web Page** (Provide a URL link to a web page specific for this measure that contains current detailed specifications including code lists, risk model details, and supplemental materials. Do not enter a URL linking to a home page or to general information.)

[http://www.cap.org/apps/docs/advocacy/pathology\\_performance\\_measurement.pdf](http://www.cap.org/apps/docs/advocacy/pathology_performance_measurement.pdf)

**S.2a. If this is an eMeasure**, HQMF specifications must be attached. Attach the zipped output from the eMeasure authoring tool (MAT) - if the MAT was not used, contact staff. (Use the specification fields in this online form for the plain-language description of the specifications)

**Attachment:**

**S.2b. Data Dictionary, Code Table, or Value Sets** (and risk model codes and coefficients when applicable) must be attached. (Excel or csv file in the suggested format preferred - if not, contact staff)

**Attachment:**

**S.3. For endorsement maintenance**, please briefly describe any changes to the measure specifications since last endorsement date and explain the reasons.

**S.4. Numerator Statement** (Brief, narrative description of the measure focus or what is being measured about the target population, i.e., cases from the target population with the target process, condition, event, or outcome)

IF an OUTCOME MEASURE, state the outcome being measured. Calculation of the risk-adjusted outcome should be described in the calculation algorithm.

Numerator: Esophageal biopsy reports with the histologic finding of Barrett's mucosa that contain a statement about dysplasia (present, absent, or indefinite; and if present, contains appropriate grading.)

3125F Esophageal biopsy report with a statement about dysplasia (present, absent, or indefinite)

**S.5. Time Period for Data** (What is the time period in which data will be aggregated for the measure, e.g., 12 mo, 3 years, look back to August for flu vaccination? Note if there are different time periods for the numerator and denominator.)

Report once per patient per date of service

**S.6. Numerator Details** (All information required to identify and calculate the cases from the target population with the target process, condition, event, or outcome such as definitions, specific data collection items/responses, code/value sets – Note: lists of individual codes with descriptors that exceed 1 page should be provided in an Excel or csv file in required format at S.2b)

IF an OUTCOME MEASURE, describe how the observed outcome is identified/counted. Calculation of the risk-adjusted outcome should be described in the calculation algorithm.

Numerator: Esophageal biopsy reports with the histologic finding of Barrett's mucosa that contain a statement about dysplasia (present, absent, or indefinite; and if present, contains appropriate grading.)

3126F Esophageal biopsy report with a statement about dysplasia (present, absent, or indefinite and if present, contains appropriate grading .))

G8797 – Specimen site other than anatomic location of esophagus

**S.7. Denominator Statement** (Brief, narrative description of the target population being measured)

Denominator (Eligible Population): All esophageal biopsy reports that document the presence of Barrett's mucosa.

CPT codes:

- 88305 Level IV – Surgical pathology, gross and microscopic examination

AND

?ICD-10 codes: K22.70, K22.710, K22.711, K22.719

**S.8. Target Population Category** (Check all the populations for which the measure is specified and tested if any):

Senior Care

**S.9. Denominator Details** (All information required to identify and calculate the target population/denominator such as definitions, specific data collection items/responses , code/value sets – Note: lists of individual codes with descriptors that exceed 1 page should be provided in an Excel or csv file in required format at S.2b)

The pathology report is needed as well as access to correct coding of claims to identify patients:

CPT codes:

- 88305 Level IV – Surgical pathology, gross and microscopic examination

AND

ICD-10 codes: K22.70, K22.710, K22.711, K22.719

**S.10. Denominator Exclusions** (Brief narrative description of exclusions from the target population)

Documentation of medical reason for not reporting the histologic finding of Barrett's mucosa (eg, malignant neoplasm or absence of intestinal metaplasia).

**S.11. Denominator Exclusion Details** (All information required to identify and calculate exclusions from the denominator such as definitions, specific data collection items/responses, code/value sets – Note: lists of individual codes with descriptors that exceed 1 page should be provided in an Excel or csv file in required format at S.2b)

Documentation of medical reason for not reporting the histologic finding of Barrett's mucosa (eg, malignant neoplasm or absence of intestinal metaplasia). [For patient with appropriate exclusion criteria, report 3126F with modifier 1P]

**S.12. Stratification Details/Variables** (All information required to stratify the measure results including the stratification variables, definitions, specific data collection items/responses, code/value sets – Note: lists of individual codes with descriptors that exceed 1 page should be provided in an Excel or csv file in required format with at S.2b)

Not applicable

**S.13. Risk Adjustment Type** (Select type. Provide specifications for risk stratification in S.12 and for statistical model in S.14-15)

No risk adjustment or risk stratification

If other:

**S.14. Identify the statistical risk model method and variables** (Name the statistical method - e.g., logistic regression and list all the risk factor variables. Note - risk model development and testing should be addressed with measure testing under Scientific Acceptability)

Not applicable

**S.15. Detailed risk model specifications** (must be in attached data dictionary/code list Excel or csv file. Also indicate if available at measure-specific URL identified in S.1.)

Note: Risk model details (including coefficients, equations, codes with descriptors, definitions), should be provided on a separate worksheet in the suggested format in the Excel or csv file with data dictionary/code lists at S.2b.

**S.15a. Detailed risk model specifications** (if not provided in excel or csv file at S.2b)

**S.16. Type of score:**

Rate/proportion

If other:

**S.17. Interpretation of Score** (Classifies interpretation of score according to whether better quality is associated with a higher score, a lower score, a score falling within a defined interval, or a passing score)

Better quality = Higher score

**S.18. Calculation Algorithm/Measure Logic** (Describe the calculation of the measure score as an ordered sequence of steps including identifying the target population; exclusions; cases meeting the target process, condition, event, or outcome; aggregating data; risk adjustment; etc.)

Performance Measure:

3126F/CPT codes 88305 and ICD-9 codes 530.85 - G8797

**S.19. Calculation Algorithm/Measure Logic Diagram URL or Attachment** (You also may provide a diagram of the Calculation Algorithm/Measure Logic described above at measure-specific Web page URL identified in S.1 OR in attached appendix at A.1)

**S.20. Sampling** (If measure is based on a sample, provide instructions for obtaining the sample and guidance on minimum sample size.)

IF a PRO-PM, identify whether (and how) proxy responses are allowed.

Not applicable

**S.21. Survey/Patient-reported data** (If measure is based on a survey, provide instructions for conducting the survey and guidance on minimum response rate.)

IF a PRO-PM, specify calculation of response rates to be reported with performance measure results.

**S.22. Missing data** (specify how missing data are handled, e.g., imputation, delete case.)

Required for Composites and PRO-PMs.

**S.23. Data Source** (Check ONLY the sources for which the measure is SPECIFIED AND TESTED).

If other, please describe in S.24.

Administrative claims, Other, Paper Medical Records

<p><b>S.24. Data Source or Collection Instrument</b> (<i>Identify the specific data source/data collection instrument e.g. name of database, clinical registry, collection instrument, etc.</i>)          IF a PRO-PM, identify the specific PROM(s); and standard methods, modes, and languages of administration.  <a href="#">Medical records/pathology report/Claims forms</a></p> <p><b>S.25. Data Source or Collection Instrument</b> (<i>available at measure-specific Web page URL identified in S.1 OR in attached appendix at A.1)</i></p> <p><b>S.26. Level of Analysis</b> (<i>Check ONLY the levels of analysis for which the measure is SPECIFIED AND TESTED</i>)  <a href="#">Clinician : Group/Practice, Clinician : Individual</a></p> <p><b>S.27. Care Setting</b> (<i>Check ONLY the settings for which the measure is SPECIFIED AND TESTED</i>)  <a href="#">Laboratory</a>          If other:</p> <p><b>S.28. COMPOSITE Performance Measure</b> - Additional Specifications (<i>Use this section as needed for aggregation and weighting rules, or calculation of individual performance measures if not individually endorsed.</i>)</p>
<p><b>2a. Reliability</b> – See attached Measure Testing Submission Form</p> <p><b>2b. Validity</b> – See attached Measure Testing Submission Form</p> <p><a href="#">1854_MeasureTesting_MSF5.0_Data.doc</a></p>

<p><b>3. Feasibility</b></p> <p>Extent to which the specifications including measure logic, require data that are readily available or could be captured without undue burden and can be implemented for performance measurement.</p> <p><b>3a. Byproduct of Care Processes</b>          For clinical measures, the required data elements are routinely generated and used during care delivery (e.g., blood pressure, lab test, diagnosis, medication order).</p> <p><b>3a.1. Data Elements Generated as Byproduct of Care Processes.</b>  <a href="#">generated by and used by healthcare personnel during the provision of care, e.g., blood pressure, lab value, medical condition, Coded by someone other than person obtaining original information (e.g., DRG, ICD-9 codes on claims), Abstracted from a record by someone other than person obtaining original information (e.g., chart abstraction for quality measure or registry)</a>          If other:</p> <p><b>3b. Electronic Sources</b>          The required data elements are available in electronic health records or other electronic sources. If the required data are not in electronic health records or existing electronic sources, a credible, near-term path to electronic collection is specified.</p> <p><b>3b.1. To what extent are the specified data elements available electronically in defined fields?</b> (<i>i.e., data elements that are needed to compute the performance measure score are in defined, computer-readable fields</i>)  <a href="#">Some data elements are in defined fields in electronic sources</a></p> <p><b>3b.2. If ALL the data elements needed to compute the performance measure score are not from electronic sources, specify a credible, near-term path to electronic capture, OR provide a rationale for using other than electronic sources.</b>  <a href="#">CAP measure development team is working with SNOMED Terminology Solutions staff to determine how to electronically specify this measure.</a></p> <p><b>3b.3. If this is an eMeasure, provide a summary of the feasibility assessment in an attached file or make available at a measure-specific URL.</b>          Attachment:</p> <p><b>3c. Data Collection Strategy</b></p>
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Demonstration that the data collection strategy (e.g., source, timing, frequency, sampling, patient confidentiality, costs associated with fees/licensing of proprietary measures) can be implemented (e.g., already in operational use, or testing demonstrates that it is ready to put into operational use). For eMeasures, a feasibility assessment addresses the data elements and measure logic and demonstrates the eMeasure can be implemented or feasibility concerns can be adequately addressed.

**3c.1. Describe what you have learned/modified as a result of testing and/or operational use of the measure regarding data collection, availability of data, missing data, timing and frequency of data collection, sampling, patient confidentiality, time and cost of data collection, other feasibility/implementation issues.**

**IF a PRO-PM, consider implications for both individuals providing PROM data (patients, service recipients, respondents) and those whose performance is being measured.**

To be determined; testing in planning phase.

**3c.2. Describe any fees, licensing, or other requirements to use any aspect of the measure as specified (e.g., value/code set, risk model, programming code, algorithm).**

## 4. Usability and Use

Extent to which potential audiences (e.g., consumers, purchasers, providers, policy makers) are using or could use performance results for both accountability and performance improvement to achieve the goal of high-quality, efficient healthcare for individuals or populations.

### 4a. Accountability and Transparency

Performance results are used in at least one accountability application within three years after initial endorsement and are publicly reported within six years after initial endorsement (or the data on performance results are available). If not in use at the time of initial endorsement, then a credible plan for implementation within the specified timeframes is provided.

#### 4.1. Current and Planned Use

*NQF-endorsed measures are expected to be used in at least one accountability application within 3 years and publicly reported within 6 years of initial endorsement in addition to performance improvement.*

Planned	Current Use (for current use provide URL)
Public Reporting	
Payment Program	
Quality Improvement with Benchmarking (external benchmarking to multiple organizations)	
Quality Improvement (Internal to the specific organization)	
Not in use	

#### 4a.1. For each CURRENT use, checked above, provide:

- Name of program and sponsor
- Purpose
- Geographic area and number and percentage of accountable entities and patients included

**4a.2. If not currently publicly reported OR used in at least one other accountability application (e.g., payment program, certification, licensing) what are the reasons? (e.g., Do policies or actions of the developer/steward or accountable entities restrict access to performance results or impede implementation?)**



**4a.3. If not currently publicly reported OR used in at least one other accountability application, provide a credible plan for implementation within the expected timeframes -- any accountability application within 3 years and publicly reported within 6 years of initial endorsement.** (*Credible plan includes the specific program, purpose, intended audience, and timeline for implementing the measure within the specified timeframes. A plan for accountability applications addresses mechanisms for data aggregation and reporting.*)

**4b. Improvement**

Progress toward achieving the goal of high-quality, efficient healthcare for individuals or populations is demonstrated. If not in use for performance improvement at the time of initial endorsement, then a credible rationale describes how the performance results could be used to further the goal of high-quality, efficient healthcare for individuals or populations.

**4b.1. Progress on Improvement. (Not required for initial endorsement unless available.)**

Performance results on this measure (current and over time) should be provided in 1b.2 and 1b.4. Discuss:

- Progress (trends in performance results, number and percentage of people receiving high-quality healthcare)
- Geographic area and number and percentage of accountable entities and patients included

**4b.2. If no improvement was demonstrated, what are the reasons? If not in use for performance improvement at the time of initial endorsement, provide a credible rationale that describes how the performance results could be used to further the goal of high-quality, efficient healthcare for individuals or populations.**

**4c. Unintended Consequences**

The benefits of the performance measure in facilitating progress toward achieving high-quality, efficient healthcare for individuals or populations outweigh evidence of unintended negative consequences to individuals or populations (if such evidence exists).

**4c.1. Were any unintended negative consequences to individuals or populations identified during testing; OR has evidence of unintended negative consequences to individuals or populations been reported since implementation? If so, identify the negative unintended consequences and describe how benefits outweigh them or actions taken to mitigate them.**

To be determined; not known at this time.

## 5. Comparison to Related or Competing Measures

If a measure meets the above criteria and there are endorsed or new related measures (either the same measure focus or the same target population) or competing measures (both the same measure focus and the same target population), the measures are compared to address harmonization and/or selection of the best measure.

**5. Relation to Other NQF-endorsed Measures**

Are there related measures (conceptually, either same measure focus or target population) or competing measures (conceptually both the same measure focus and same target population)? If yes, list the NQF # and title of all related and/or competing measures.

**5.1a. List of related or competing measures (selected from NQF-endorsed measures)**

**5.1b. If related or competing measures are not NQF endorsed please indicate measure title and steward.**

**5a. Harmonization**

The measure specifications are harmonized with related measures;

**OR**

The differences in specifications are justified



**5a.1. If this measure conceptually addresses EITHER the same measure focus OR the same target population as NQF-endorsed measure(s):**

**Are the measure specifications completely harmonized?**

**5a.2. If the measure specifications are not completely harmonized, identify the differences, rationale, and impact on interpretability and data collection burden.**

#### **5b. Competing Measures**

The measure is superior to competing measures (e.g., is a more valid or efficient way to measure);

**OR**

Multiple measures are justified.

**5b.1. If this measure conceptually addresses both the same measure focus and the same target population as NQF-endorsed measure(s):**

**Describe why this measure is superior to competing measures (e.g., a more valid or efficient way to measure quality); OR provide a rationale for the additive value of endorsing an additional measure. (Provide analyses when possible.)**

### **Appendix**

**A.1 Supplemental materials may be provided in an appendix.** All supplemental materials (such as data collection instrument or methodology reports) should be organized in one file with a table of contents or bookmarks. If material pertains to a specific submission form number, that should be indicated. Requested information should be provided in the submission form and required attachments. There is no guarantee that supplemental materials will be reviewed.

**Attachment:**

### **Contact Information**

**Co.1 Measure Steward (Intellectual Property Owner):** College of American Pathologists

**Co.2 Point of Contact:** Fay, Shamanski, [fshaman@cap.org](mailto:fshaman@cap.org), 202-354-7113-

**Co.3 Measure Developer if different from Measure Steward:** College of American Pathologists

**Co.4 Point of Contact:** Fay, Shamanski, [fshaman@cap.org](mailto:fshaman@cap.org), 202-354-7113-

### **Additional Information**

**Ad.1 Workgroup/Expert Panel involved in measure development**

**Provide a list of sponsoring organizations and workgroup/panel members' names and organizations. Describe the members' role in measure development.**

David Witte, MD, PhD, FCAP (Chair)

W. Stephen Black-Schaffer, MD, FCAP

Patrick Fitzgibbons, MD, FCAP

Richard C. Friedberg, MD, PhD, FCAP

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CAP Staff  
Lynn Boyd  
Janemarie Mulvey, PhD  
Fay Shamanski, PhD  
Ayanna Wooding

CPT Editorial Panel's Performance Measures Advisory Group provided comments and edits.

**Measure Developer/Steward Updates and Ongoing Maintenance**

**Ad.2 Year the measure was first released:** 2008

**Ad.3 Month and Year of most recent revision:** 08, 2010

**Ad.4 What is your frequency for review/update of this measure?** The measure will be reviewed when new data or guidelines are available or every three years.

**Ad.5 When is the next scheduled review/update for this measure?** 01, 2013

**Ad.6 Copyright statement:** © 2007 College of American Pathologists. All Rights Reserved

**Ad.7 Disclaimers:** Limited proprietary coding is contained in the Measure specifications for convenience. Users of the proprietary code sets should obtain all necessary licenses from the owners of these code sets. The College of American Pathologists disclaims all liability for use or accuracy of any Current Procedural Terminology (CPT®) or other coding contained in the specifications.

**Ad.8 Additional Information/Comments:**