

August 28, 2018

The Honorable Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
U.S. Department of Health and Human Services  
7500 Security Boulevard  
Baltimore, MD 21244

Dear Administrator Verma:

The undersigned organizations are committed to working with the Centers for Medicare and Medicaid Services (CMS) to reduce provider burden and increase Medicare beneficiaries' access to appropriate care. We applaud CMS for recognizing the problems with the current evaluation and management documentation guidelines and codes and including a significant proposal address them in the CY 2019 physician fee schedule proposed rule. However, we urge CMS to reconsider this proposal to cut and consolidate evaluation and management services, which would severely reduce Medicare patients' access to care by cutting payments for complex office visits, adversely affecting the care and treatment of patients with complex conditions, and potentially exacerbate physician workforce shortages. **Given the negative impacts of this well-intentioned proposal, we ask that CMS not finalize this concept as proposed, and instead urge CMS to work with stakeholders to identify alternative approaches that would accomplish its goal of reducing paperwork and administrative burden without endangering patient access to care.**

The proposals to consolidate the billing codes for physician evaluation and management so as to pay the same amount for office visits regardless of the complexity of the patient would cut payments for visits that are currently reimbursed at higher levels than simple or routine office visits, penalizing doctors who treat sicker patients or patients with multiple conditions. It is important to note that even small estimated changes in reimbursement will be magnified after physicians or their employers cover overhead business expenses. Additionally, payments from newly proposed add-on codes, which have been put forward with the intention of protecting complex care by making up for severe cuts, would not be sufficient to ensure continued patient access, and moreover the application of new codes to some specialties and not others would effectively result in CMS picking winners and losers.

This proposed approach to reducing paperwork would have unintended consequences for Medicare beneficiaries. To offset the reimbursement cut, some physicians may spend less time with their patients and limit each office visit to one or two problems forcing patients to return for a second additional visit to address additional medical issues. Not only will this result in an additional burden on patients with more copayments and costs associated with time and travel, it will also reduce the quality of care, particularly for patients with complex medical conditions. We are also concerned that this proposal would incentivize physicians to cherry-pick healthy patients to avoid financial losses. It would also severely exacerbate physician shortages by discouraging young physicians from going into careers that provide complex care.

We agree with CMS' ultimate goal of increasing the amount of time physicians have to spend with patients instead of paperwork and computers, but the collapsing of evaluation and management codes would have an immediate and lasting effect of restricting patient access to care. **We therefore urge CMS not to move forward with the proposal as it currently stands, and instead convene stakeholders to identify other strategies to reduce paperwork and administrative burden that do not threaten patient access to care.** We stand ready to work with you to ensure physicians have the resources they need to provide patients with the high-quality care they deserve. Thank you for your consideration.

Sincerely,

Accelerated Cure Project for Multiple Sclerosis  
Advocacy Council of ACAAI  
Alabama Academy of Neurology  
Alabama Society for the Rheumatic Diseases  
Alaska Rheumatology Alliance  
Alliance for Headache Disorders Advocacy  
Alliance for Patient Access  
American Academy of Allergy, Asthma & Immunology  
American Academy of Dermatology Association  
American Academy of Neurology  
American Academy of Physical Medicine & Rehabilitation  
American Association of Chairs of Departments of Psychiatry  
American Association of Clinical Endocrinologists  
American Association of Neuromuscular & Electrodiagnostic Medicine (AANEM)  
American Autoimmune Related Diseases Association  
American Brain Coalition  
American Clinical Neurophysiology Society  
American College of Gastroenterology  
American College of Rheumatology  
American Epilepsy Society  
American Gastroenterological Association  
American Headache Society  
American Heart Association & American Stroke Association  
American Migraine Foundation  
American Neurological Association  
American Podiatric Medical Association  
American Professional Wound Care Association  
American Psychiatric Association  
American Society of Clinical Psychopharmacology  
American Society of Hematology  
American Society of Neuroimaging  
American Society of Podiatric Surgeons  
Arizona Neurological Society  
Arizona United Rheumatology Alliance  
Arthritis Foundation  
Association of Advancement of Wound Care  
Association of Idaho Rheumatologists  
Association of Migraine Disorders  
Bridge the Gap - SYNGAP Education and Research Foundation  
California Neurology Society  
California Rheumatology Alliance  
Can Do Multiple Sclerosis  
Child Neurology Foundation  
Child Neurology Society  
Chronic Migraine Awareness Inc  
Coalition for Headache and Migraine Patients (CHAMP)  
Coalition of State Rheumatology Organizations  
Cognitive Care Alliance  
Colorado Society of Neurological Sciences  
Commonwealth Neurological Society (Kentucky)  
Connecticut Neurological Society  
Connecticut Rheumatology Association  
Consortium of Multiple Sclerosis Centers

Crohn's & Colitis Foundation  
cureCADASIL  
Danielle Byron Henry Migraine Foundation  
Diabetes Patient Advocacy Coalition  
Endocrine Society  
Florida Society of Neurology  
Florida Society of Rheumatology  
Georgia Neurological Society  
Georgia Society of Rheumatology  
Global Healthy Living Foundation  
Hawaii Neurological Society  
HIV Medicine Association  
Huntington's Disease Society of America (HDSA)  
Indiana Neurological Society  
Infectious Diseases Society of America  
International Essential Tremor Foundation  
Iowa Neurological Association  
JDRF  
Lupus and Allied Diseases Association  
Lupus Foundation of America  
MA, ME, NH Rheumatology Association  
Massachusetts Neurologic Association  
Metropolitan Atlanta Rheumatology Society  
Michigan Rheumatism Society  
Midwest Rheumatology Association  
Minnesota Society of Neurological Sciences  
Missouri-Kansas Neurological Society  
MS Coalition  
MS Views and News  
Multiple Sclerosis Association of America  
Multiple Sclerosis Foundation, Inc.  
National Association of Epilepsy Centers  
National Association of State Head Injury Administrators  
National Headache Foundation  
National Multiple Sclerosis Society  
Nebraska Rheumatology Society  
New York State Neurological Society  
New York State Rheumatology Society  
North American Neuro-Ophthalmology Society (NANOS)  
North Carolina Neurological Society  
North Carolina Rheumatology Association  
Northern California Rheumatology Society  
Ohio Association of Rheumatology  
Oregon Rheumatology Alliance  
Pennsylvania Neurological Society  
Philadelphia Rheumatism Society  
Rheumatology Alliance of Louisiana  
Rheumatology Alliance of Minnesota and the Dakotas  
Rheumatology Association of Iowa  
Rheumatology Association of Nevada  
Rheumatology Society of North Texas  
Rhode Island Neurological Society  
Runnin' For Research

Schizophrenia and Related Disorders Alliance of America  
Sjogren's Syndrome Foundation  
Society for Neuro-Oncology  
Society of General Internal Medicine  
Society of Gynecologic Oncology  
South Carolina Neurological Association  
South Carolina Rheumatism Society  
State of Texas Association of Rheumatologists  
Tennessee Rheumatology Society  
Texas Neurological Society  
Texas Rheumatology Care  
The ALS Association  
The Childhood Brain Tumor Foundation  
The Headache and Migraine Policy Forum  
The Michael J. Fox Foundation for Parkinson's Research  
The US Oncology Network  
Tourette Association of America  
United Spinal Association  
Virginia Neurological Society  
Virginia Society of Rheumatologists  
Washington Rheumatology Alliance  
Washington State Neurological Society  
West Virginia Rheumatology State Society  
Wisconsin Neurological Society  
Wisconsin Rheumatology Association  
World Health Education Foundation  
Wyoming Neurological Society