



September 26, 2019

Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

RE: CMS-1715-P, Medicare Program: CY 2020 Revisions to Payment Policies Under the Physician Fee Schedule and Other Changes to Part B Payment Policies

Filed electronically at <https://www.regulations.gov>

Dear Administrator Verma:

The Cystic Fibrosis Foundation is a national organization actively engaged in the research and development of new therapies for cystic fibrosis (CF) and also in protecting patient access to quality CF care. CF care centers across the nation, with support from the CF Foundation, participate in a care center network that actively pursues ongoing quality improvement. The care provided to people with CF at those care centers is guided by the best available evidence and clinical experience.

As a result of new therapy development and the delivery of quality CF care, the average age of those with CF continues to climb. There are now as many adults with CF as children with the disease, a testament to improvements in care and therapies. In fact, there is a growing population of people with CF who are enrolled in Medicare, qualifying by age or through Social Security Disability. The coverage and payment policies of Medicare are of great concern to us because of their impact on people with CF.

We appreciate the opportunity to comment on the physician fee schedule proposal for calendar year 2020.

***Evaluation and Management Services***

We commend the Centers for Medicare & Medicaid Services (CMS) for consulting with a wide range of stakeholders regarding revisions to evaluation and management office visit coding and

proposing to align E/M coding with the framework adopting by the American Medical Association/CPT Editorial Panel.

The proposal, to be effective for services starting January 1, 2021, would retain five levels of coding for established patients and reduce to four the levels of coding for new patients. In addition, a new CPT code will be implemented for extended office visit time. We support the retention of several distinct levels of coding, instead of the previous plan to collapse codes to two levels. The separate levels of coding, in combination with a code for extended office visit time, will better acknowledge and support the level of services provided to people with CF.

With its previous E/M coding proposal, CMS stimulated active discussion, debate, and controversy. We appreciate that the discussion and deliberation among CMS and stakeholders resulted in strong E/M coding proposals.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary Dwight", with a stylized flourish at the end.

Mary Dwight  
Senior Vice President of Policy and Advocacy