

## **ISIS Strongly Objects to CMS' Decision to Decrease Values of Interlaminar Epidural Injections**

On November 27, 2013, the Centers for Medicare and Medicaid Services (CMS) released the final rule of the Medicare Physician Fee Schedule. In it, CMS announced that it will not accept the proposed physician work relative value units (RVUs) for interlaminar epidural injections.

These injections underwent an extensive review by the RUC after code 62311 was “flagged” by CMS as a potentially misvalued code on their high expenditure screen, published in 2011. As such, the entire family of codes had to be reviewed. In 2012, ISIS, along with multiple other medical societies, surveyed their membership on the time and work intensity involved in the performance of these procedures. After the survey, the results and value recommendations were presented to the AMA Relative Value Update Committee (RUC). The RUC accepted the specialty societies’ recommendations to keep the physician work values at the same level (except for 62310, which was lowered from 1.91 to 1.68).

We are disappointed to learn that CMS did not accept the values that were approved by a national expert panel consisting of representatives from 26 different medical societies. Additionally, major decreases were published by CMS on the Practice Expense components of these codes. ISIS is currently reviewing these to assess our options.

ISIS will be drafting a letter to CMS with comments and to request a refinement panel hearing. We have participated in refinement hearings in the past, including a hearing on transforaminal injections that resulted in a slight increase of the work value for one of those codes.

Given the substantial size of the cuts, the fact that physicians had no knowledge of this decision prior to the final rule’s release, and that no opportunity was provided to comment on the changes before they were to go into effect, ISIS feels it is imperative that CMS does not implement this decision in January 2014. Such drastic changes in reimbursement should be allowed a proper public comment period. ISIS members are encouraged to take the following actions to assist in halting these cuts:

- **Contact CMS to urge them to accept the RUC recommendations for physician work values of these codes and to abandon the plan to implement these harsh cuts as of January 1, 2014.**

Comments to CMS can be submitted at:

<http://www.regulations.gov/#!submitComment;D=CMS-2013-0155-10181>.

- **Contact Congressional Representatives and encourage them to demand that CMS abandon the plans for the cuts and at a minimum, postpone the cuts pending a proper review and public comment period:**

To find the contact information for your House Representative:

<http://house.gov/htbin/findrep?ZIP=>

To find the contact information for your State’s Senator:

[http://www.senate.gov/general/contact\\_information/senators\\_cfm.cfm](http://www.senate.gov/general/contact_information/senators_cfm.cfm)

**Summary of changes in reimbursement for interlaminar epidural injections.**

Members are reminded that fluoroscopic guidance 77003 can still be billed with the interlaminar epidural procedures for an average additional payment of \$ ~\$86.

	PHYSICIAN WORK RVU			NON FACILITY (PERFORMED IN OFFICE) PRACTICE EXPENSE RVU			FACILITY PRACTICE EXPENSE RVU			LIABILITY RVU			TOTAL NON-FACILITY PRICE			TOTAL FACILITY PRICE		
	2014	2013	% CHANGE 2013-2014	2014	2013	% CHANGE 2013-2014	2014	2013	% CHANGE 2013-2014	2014	2013	% CHANGE 2013-2014	2014	2013	% CHANGE 2013-2014	2014	2013	% CHANGE 2013-2014
62310 Inject spine cerv/thoracic	1.18	1.91	-38.2%	1.81	5.37	-66.3%	0.79	1.18	-33.1%	0.10	0.16	-37.5%	\$105.13	\$253.13	-58.5%	\$70.43	\$110.57	-36.3%
62311 Inject spine lumbar/sacral	1.17	1.54	-24.0%	1.78	4.61	-61.4%	0.77	0.99	-22.2%	0.09	0.16	-43.8%	\$103.43	\$213.32	-51.5%	\$69.07	\$90.16	-23.4%
62318 Inject spine w/cath crv/thrc	1.54	2.04	-24.5%	1.46	4.99	-70.7%	0.57	0.77	-26.0%	0.11	0.16	-31.3%	\$105.81	\$244.63	-56.7%	\$75.53	\$101.05	-25.3%
62319 Inject spine w/cath lmb/scrl	1.50	1.87	-19.8%	1.59	3.14	-49.4%	0.65	0.84	-22.6%	0.12	0.16	-25.0%	\$109.21	\$175.90	-37.9%	\$77.23	\$97.65	-20.9%

The final rule can be reviewed in its entirety [here](#).