

December 23, 2013

Marilyn B. Tavenner
Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Hubert H. Humphrey Building, Room 445-G
200 Independence Avenue, SW
Washington, DC 20201

Dear Administrator Tavenner,

The undersigned pain medicine specialty societies respectfully request that the Centers for Medicare and Medicaid Services (CMS) stop implementation of steep cuts to physician payments for Interlaminar Epidural procedures (CPT® Codes 62310, 62311, 62318, 62319). These cuts were announced in the CY 2014 Medicare Physician Payment Rule which was released on November 27, 2013 and will go into effect on January 1, 2014.

CMS will reduce payments for these services up to 58%. We believe reductions of this magnitude will have a devastating effect on Medicare beneficiaries' access to pain medicine. They may ultimately result in increased costs overall to Medicare if they force office-based physicians to close or move into the more expensive hospital setting.

We are also concerned that such **significant cuts** will be implemented on January 1, 2014. We understand that because of the timing of the code development and valuation cycle, the Agency does not include new or revised code-level values in the proposed fee schedule and establishes them as interim final for the upcoming year. However, due to the magnitude of the cuts to Interlaminar Epidural procedures, we believe special consideration is warranted and request CMS delay implementation of the cuts to codes 62310, 62311, 62318, and 62319 until after all comments have been received and reviewed.

We are committed to the goal of fair payment for Medicare services, which is why we urge you to stop implementation of the significant cuts to Interlaminar Epidural procedures and maintain CY 2013 payment rates.

We appreciate your prompt consideration of this request.

Sincerely,

American Academy of Pain Medicine
American Academy of Physical Medicine and Rehabilitation
American Society of Anesthesiologists
American Society of Interventional Pain Physicians
American Society of Regional Anesthesia and Pain Medicine
International Spine Intervention Society
North American Neuromodulation Society
North American Spine Society