

(Insert Date)

Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1694-P
P.O. Box 8011
Baltimore, MD 21244-1850
Re: Comments on the FY 2020 IPPS Proposed Rule Designation

To Whom We May Address:

Thank you for allowing us the opportunity to submit comments regarding the proposed IPPS rules for FY 2020. (Insert name of institution here) is grateful for the efforts of your organization to improve the nation's health, and for your willingness to review additional information during the public comment period before issuing your final rules. It's clear that great time and effort was invested in the proposed rule, and we appreciate and recognize this work of public service.

(We suggest a letter of "General Concerns" for those larger topics that may encompass several different code issues. This helps to avoid a nearly infinite "laundry list" of specific objections to specific codes. As before, we encourage your own revisions as supported by your home base.)

We would like to comment on some of the proposed changes that we feel have an unintentional impact on healthcare and the general public. Our first concern references the extrapolation of the CMS Medicare database to other patient populations. For example, with the 700-plus codes for malignancies that are proposed for re-designation as "Non-CC's," it's quite understandable how Medicare claims data might indicate that these have no bearing on resource use and patient care. Medicare data is by and large compiled from the elderly, who often have multiple other medical conditions present that demand more intense care as drivers of claims and DRG assignment or may be receiving palliative care rather than aggressive therapy due to age and the presence of other medical problems. However, as history has shown, both Medicaid and private payers often take their cues from Medicare. A demotion of the designated malignancy codes to non-CC status may adversely impact those younger adult and pediatric patients with the same malignancies. The younger patients often don't have a multitude of other illnesses that would offset the impact of the malignancy in the calculations of resource allocations as is demonstrated in the older patient. The younger patient often pursues multiple modalities of treatment for the diagnosed malignancy and these treatments have an associated risk of adverse effects, requiring acute care interventions.

We have similar concerns with regards to the data analysis of Medicare claims for elderly patients with congenital and genetic disease that have a higher rate of occurrence in the pediatric and young adult population. A specific example of this would be sickle cell disease and the proposed changes in CC designation. We would urge CMS to reconsider all MCC/ CC changes within the proposed rule in light of what medical issues are common in different age groups, and focus changes within the proposed rules to those problems not seen in the pediatric or young adult populations.

Another of our general concerns is that clinical severity is often not consistently reflected in the MCC/CC designations. For example, the new rule proposes that moderate malnutrition (E44.0) be an MCC, while

severe malnutrition (E43) is a CC despite terminology which clearly indicates an increased severity of needs. Similarly, the code for an acute exacerbation of severe persistent asthma (J45.51) is now an MCC and it actually outweighs J codes for status asthmaticus (J45.02, J45.22, J45.32, J45.42, J45.52). Clinically, status asthmaticus is a more severe respiratory condition. These proposed changes are inconsistent with the clinical use of the relevant terms. We would encourage the rule to maintain the current status of E43 as an MCC, E44.0 as a CC, and J45.51 as a CC.

Thank you for the opportunity to comment on the proposed FY 2020 IPPS rule. On behalf of (insert your institution here), we look forward to your review of our comments, and to our future participation in the rule-making process. We greatly appreciate your time and consideration.

Sincerely,

(Insert Name, Title, Institution)