

UPDATE

neurosurgery

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Neurosurgery Comments on the 2015 Medicare Physician Fee Schedule Proposed Rule

Last week, the American Association of Neurological Surgeons (AANS) and Congress of Neurological Surgeons (CNS) submitted comments concerning several aspects of the 2015 Medicare Physician Fee Schedule Proposed Rule released by the Centers for Medicare and Medicaid Services (CMS). Our comment letters addressed the following topics:

Reimbursement-related Provisions

- The AANS and CNS strongly oppose eliminating the 10- and 90-day surgical global periods.
- The AANS and CNS support implementing an improved schedule for adopting new values and urge CMS to institute a meaningful appeal and review process.
- The AANS and CNS are long-time proponents of private contracting for Medicare patients and support the ability of physicians to opt-out of the program without filing an affidavit every two years to remain in an opt-out status.

Quality-related Provisions

- The AANS and CNS oppose the proposal to increase PQRS reporting requirements and eliminate several surgery quality measures, as this will leave neurosurgeons with few, if any, relevant and meaningful mechanisms by which to participate. This is especially concerning as the PQRS transitions to an all-penalty program, under which physicians face annual quality reporting penalties of over ten percent in the coming years.
- The AANS and CNS oppose the proposed timeline for tying Medicare payments to physician performance via the Value-Based Payment Modifier (VBM) and for public reporting physician performance data because it is much too aggressive and leaves little opportunity to evaluate the data's accuracy, its relevance to patients and physicians, and the impact on smaller practices and individual physicians.
- The AANS and CNS support the PQRS Qualified Clinical Data Registry (QCDR) reporting option; however, many existing and proposed requirements will make it challenging, if not impossible, for specialties to take advantage of this option and contradict the flexibility it was intended to afford.

Open Payment Continuing Medical Education (CME) Exemption

- The AANS and CNS strongly oppose the proposal to eliminate the CME exemption from the Physician Sunshine Open Payment system. The current exemption, which requires compliance with the rigorous Accreditation Council for Continuing Medical Education's (ACCME) Standards for Commercial Support: Standards to Ensure Independence in CME Activities, meets the goals of the Sunshine Act. At a minimum, a change in the CME policy should be delayed until organizations and CMS can fully analyze the impact of the proposal to eliminate the current exemption.

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The American Association of Neurological Surgeons (AANS), founded in 1931, and the Congress of Neurological Surgeons (CNS), founded in 1951, are the two largest scientific and educational associations for neurosurgical professionals in the world. These groups represent over 8,000 neurosurgeons worldwide. Neurological surgery is the medical specialty concerned with the prevention, diagnosis, treatment and rehabilitation of disorders that affect the entire nervous system, including the spinal column, spinal cord, brain and peripheral nerves. For more information, please visit www.aans.org or www.cns.org, read our blog www.neurosurgeryblog.org, follow us on [Twitter](https://twitter.com) or connect with us on [Facebook](https://facebook.com).