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**Nineteen Surgical Organizations Strongly Oppose CMS’ Plan to Implement the G2211 Code**

Implementation of add-on code G2211 would inappropriately result in overpayments and at the same time penalize all physicians

WASHINGTON, DC (July 26, 2023): The American College of Surgeons (ACS), with 18 other surgical organizations, has expressed strong opposition to the implementation of Centers for Medicare & Medicaid Services (CMS) code G2211, which would harm surgeons and, in turn, surgical patients.

In a letter today to CMS, the 19 groups expressed continued opposition to the code, which was first introduced in 2020 but has been delayed for three years. During this time, nothing has been done to fix flaws in the G2211 code or the larger problems with the Medicare physician payment system.

**What is code G2211?**

The G2211 add-on code is an effort by CMS to pay more for certain office visits. These additional payments would predominantly help primary care physicians despite the fact that the majority of the office visit codes for this type of care were increased in 2021.

There is no longer a valid justification for G2211. Under the new coding rules for office visits, physicians and qualified healthcare professionals have the flexibility to bill a higher-level code to account for increased medical decision-making or total time of the encounter. The numerous codes currently available for documenting work and time across various levels of care make G2211 redundant and, therefore, unnecessary.

Additionally, G2211 would inappropriately result in overpayments to those using it and at the same time penalize all physicians due to a reduction in the Medicare conversion factor that will be required to maintain budget neutrality under the 2024 Medicare Physician Fee Schedule proposed rule.

**Fixing Medicare physician payment**

In addition to the flawed G2211 code, Congress has not taken any steps to fix the broken Medicare physician payment system and create a long-term solution. A flawed G2211 code on top of a broken Medicare physician payment system would be incredibly harmful to the healthcare system and not serve the long-term interest of patients.

“The ACS continues to advocate for a long-term, permanent fix to the broken payment system to enable better delivery of care for patients. Congress can stop implementation of G2211, eliminate a majority of the expected 2024 Medicare physician payment cut, and not be required to expend any resources for this short-term solution,” said Patricia L. Turner, MD, MBA, FACS, ACS Executive Director and CEO.

Read the [full letter from the 19 surgical organizations](#).

The 19 surgical organizations opposing the implementation of G2211 are:
American College of Surgeons
American Academy of Facial Plastic and Reconstructive Surgery
American Academy of Ophthalmology
American Association of Neurological Surgeons
American Association of Orthopaedic Surgeons
American College of Obstetricians and Gynecologists
American Orthopaedic Foot & Ankle Society
American Society of Metabolic and Bariatric Surgery
American Society for Surgery of the Hand Professional Organization
American Society of Breast Surgeons
American Society of Cataract and Refractive Surgery
American Society of Colon & Rectal Surgeons
American Society of Plastic Surgeons
American Society of Retina Specialists
American Urogynecologic Society
American Urological Association
Congress of Neurological Surgeons
Society for Vascular Surgery
The Society of Thoracic Surgeons

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About the American College of Surgeons
The American College of Surgeons is a scientific and educational organization of surgeons that was founded in 1913 to raise the standards of surgical practice and improve the quality of care for all surgical patients. The College is dedicated to the ethical and competent practice of surgery. Its achievements have significantly influenced the course of scientific surgery in America and have established it as an important advocate for all surgical patients. The College has more than 87,000 members and is the largest organization of surgeons in the world. "FACS" designates that a surgeon is a Fellow of the American College of Surgeons.

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