

July 6, 2020

The Honorable Nancy Pelosi  
Speaker  
United States House of Representatives  
Washington, DC 20515

The Honorable Kevin McCarthy  
Minority Leader  
United States House of Representatives  
Washington, DC 20515

The Honorable Mitch McConnell  
Majority Leader  
United States Senate  
Washington, DC 20510

The Honorable Charles Schumer  
Minority Leader  
United States Senate  
Washington, DC 20510

Dear Speaker Pelosi, Minority Leader McCarthy, Majority Leader McConnell, and Minority Leader Schumer:

On behalf of the undersigned organizations, who represent hundreds of thousands of physicians and medical students across the country, we urge you to take the appropriate steps to ensure that the Centers for Medicare & Medicaid Services (CMS) moves forward with its finalized documentation guidelines and increased relative value units (RVUs) for office and outpatient evaluation and management (E/M) services as part of the 2021 Medicare Physician Fee Schedule (MPFS). Doing so will preserve access to high quality, affordable care especially at a time when access to care is so important.

### **Implement Documentation Relief and Increased RVUs for E/M Services in 2021**

In the final rule on the 2020 MPFS, CMS finalized its intent to use the Current Procedural Terminology (CPT) Editorial Panel coding framework and American Medical Association/Specialty Society Relative Value Scale Update Committee (RUC) recommended values for office and outpatient E/M services starting January 1, 2021. These finalized policies are essential to improving care delivery. They will enhance patient engagement to improve care outcomes, increase longevity, lower costs, and reduce preventable hospital and emergency room admissions. The historic undervaluation of E/M services and the excessive documentation requirements placed on physicians has severely limited the ability of physicians to provide care and has exponentially increased administrative burden, despite an aging population that will increasingly require these services. Therefore, it is critical the increases in E/M office visit RVUs and improved documentation guidelines for physicians move forward in 2021 as scheduled. In addition, CMS finalized the implementation of a Healthcare Common Procedure Coding System (HCPCS) code for visit complexity that will be applicable to most E/M office visits. This add-on code will result in additional, necessary resources that enable physicians to provide better care for their patients. As a whole, CMS' new policies will lead to significant reduction in administrative burden and better describe and recognize the resources involved in office visits as they are performed today.

### **Budget Neutrality Should Not Delay E/M RVU Increases or Visit Complexity Code**

Our organizations are in support of waiving the budget neutrality (BN) requirements in 2021 as a measure to mitigate financial instability as a result of the Public Health Emergency (PHE). However, waiving BN must not in any way be accompanied by other policy changes that would delay or reduce the E/M RVU increases, or the HCPCS code for visit complexity, as finalized in the 2020 MPFS Final Rule. These changes are urgently needed to help sustain primary care at a time when many practices are at risk of closing their doors because of continued revenue losses resulting from the COVID-19 pandemic, particularly when access to primary care is critical to caring for the tens of millions of patients who need, and may have delayed, getting preventive care and treatment for their acute and chronic illnesses from their primary care physician. We continue to support CMS' planned actions in this regard and look forward to their implementation as part of the 2021 MPFS.

Thank you for your consideration of these requests. If you have any questions, please contact Stephanie Quinn, the AAFP's Senior Vice President for Advocacy, Practice Advancement, and Policy at [squinn@aafp.org](mailto:squinn@aafp.org) or Richard Trachtman, ACP's Director of Legislative Affairs at [rtrachtman@acponline.org](mailto:rtrachtman@acponline.org).

Sincerely,

American Academy of Family Physicians  
American College of Physicians  
American Academy of Allergy, Asthma and Immunology  
American Academy of Hospice and Palliative Medicine  
American Academy of Neurology  
American Association of Clinical Endocrinologists  
American College of Allergy, Asthma and Immunology  
American College of Chest Physicians  
American College of Gastroenterology  
American College of Rheumatology  
American Gastroenterological Association  
American Geriatrics Society  
American Medical Society for Sports Medicine  
American Society for Gastrointestinal Endoscopy  
American Society of Hematology  
American Society of Nephrology  
American Thoracic Society  
Association for Clinical Oncology  
Endocrine Society  
Infectious Diseases Society of America  
Renal Physicians Association  
Society of Critical Care Medicine  
Society of General Internal Medicine  
The Society for Post-Acute and Long Term Care Medicine