

February 28, 2019

Ms. Seema Verma
Administrator
Centers for Medicare and Medicaid Services
200 Independence Ave SW
Washington, DC 20201

Re: CMS-2018-0154

Dear Administrator Verma:

The Healthcare Information and Management Systems Society (HIMSS) and the Personal Connected Health Alliance (PCHAlliance) are pleased to have the opportunity to provide comments on the “Advance Notice of Methodological Changes for Calendar Year (CY) 2020 for Medicare Advantage (MA) Capitation Rates, Part C and Part D Payment Policies and 2020 Draft Call Letter” (aka Advance Notice 2020 Part 2). We appreciate the CMS’ leadership and diligent work to modernize Medicare and advance connected health for Medicare beneficiaries. Our comments are limited and address what we believe is a simple correction in one of the new 2020 Display Measures that would ensure that appropriate new connected care Medicare Part B covered services are included.

Specifically, for the new 2020 Display Measure titled “Follow-up after Emergency Department Visit for Patients with Multiple Chronic Conditions (Part C)” we request that CMS add: remote physiologic monitoring (CPT Codes 99453, 99453, and 99457) to the list of follow up services that meet the criteria for appropriate follow up. The following outlines why remote physiologic monitoring is an appropriate follow up after an emergency department visit for patients with multiple chronic conditions:

- The use of remote physiologic monitoring for patients with chronic conditions is widely documented to prevent complications, reduce hospitalizations, and engage patients. Review of the extensive literature on remote physiologic monitoring, including a review of decades of research and publications by the Agency for Health Research and Quality (AHRQ), identified use with patients with multiple chronic conditions as linked to reduction in rehospitalization, lower costs, and improved outcomes.
- Pilot programs at several hospitals and health systems demonstrate use of remote physiologic monitoring for patients with multiple chronic conditions, post hospital discharge and/or post-emergency department visit, to reduce re-hospitalization, improve outcomes and lower total costs of care.

We appreciate the opportunity to provide input on the Advance Notice 2020 Part 2. We very much hope that the minor modification we recommend, which aligns the new 202 Display Measure with the CY2019 Medicare Physician Fee Schedule and policies to adopt evidence based virtual care, can be adopted in the final call letter. HIMSS and PCHAlliance look forward to working with CMS on policy that provides evidence based connected care for Medicare beneficiaries. If you have any additional questions, please do not hesitate to contact Eli Fleet, Director for Federal Affairs for HIMSS at efleet@himss.org, or Robert Havasy, Acting Executive Director for PCHAlliance at rhavasy@pchalliance.org.

Sincerely,

A handwritten signature in black ink that reads "Harold F. Wolf, III". The signature is written in a cursive style with a long horizontal line extending to the right from the end of the name.

Harold F. Wolf, III
President and Chief Executive Officer
HIMSS