



APSA
American Pediatric
Surgical Association
Saving Lifetimes

American Pediatric Surgical Association

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November 27, 2018

Seema Verma, Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Via email: Seema.Verma@cms.hhs.gov

Re: CMS-1694-P Fiscal Year 2020 Inpatient Prospective Payment Systems for Acute Care Hospitals – Coding and MS-DRG Classification for Extracorporeal Membrane Oxygenation (ECMO)

Dear Administrator Verma,

The American Pediatric Surgery Association (APSA) joins the societies in the attached letter in writing to request that all Extracorporeal Membrane Oxygenation (ECMO) codes be reassigned back to Pre-Major Diagnostic Category (Pre-MDC) Medicare Severity Diagnosis Related Group (MS-DRG) 003 for FY 2020 and that the Centers for Medicare and Medicaid Services (CMS) take steps to mitigate the negative impact of these changes in 2019. First, we have significant concerns with the process, the lack of transparency, and the lack of opportunity to provide public comment on the MS-DRG assignment for services related to ECMO for FY-2019.

Second, and more importantly, MS-DRG assignment of ECMO patients based upon the method of vascular cannulation as CMS has done in the FY 2019 IPPS will have a substantial negative financial impact on medical centers providing these services. As a result, we are concerned that many programs could close leading to reduced availability of ECMO and an increasing number of children dying who would otherwise benefit from this life-saving care.

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With this in mind, we request that CMS do the following:

1. Meet with the medical specialty societies listed in the attached letter to find a way to mitigate the inappropriate negative financial impact of these changes for FY 2019 in order to prevent closure of ECMO programs and other unintended consequences including denying patients access to a lifesaving procedure.
2. Reassign all ECMO ICD-10 PCS codes (5A1522F, 5A1522G and 5A1522H), regardless of the cannulation method, to Pre-MDC MS-DRG 003 for FY 2020.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Hirschl", with a stylized flourish at the end.

Ronald B. Hirschl, MD
President