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the Field of Transplantation

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Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1612-P
Room 445-G, Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, DC 20201

Attention: CMS-1612-P Room 445-G
Re: AST Comment on the CMS Physician Fee Schedule Proposed Rule for 2015

September 2, 2014

Dear Administrator Tavenner:

On behalf of the American Society of Transplantation (AST), representing more than 3300 professionals engaged in the field of solid organ transplantation, we applaud your leadership and ongoing efforts to strengthen and improve the Medicare Program. The AST has enjoyed working closely for many years with the Centers for Medicare and Medicaid Services (CMS) and the Department of Health and Human Services (HHS) to advance the field of organ transplantation for the thousands of individuals awaiting a life-saving donor organ.

We write to you today in support of official comments submitted to CMS from the American Society of Transplant Surgeons (ASTS) addressing the 2015 Medicare Physician Fee Schedule Proposed Rule (the Proposed Rule). The AST joins ASTS in their comments on specific changes to the CMS Proposed Rule as follows:

- 1) Valuation and Coding of the 10 and 90 day Global Surgical Package:
We share the ASTS concerns that this process carefully consider the impact of any changes on the transplant surgeons, transplant physicians, transplant programs and their patient institutions that could impact our ability to continue providing the high quality of care necessary for our very complicated patient populations.
- 2) Revision of Sunshine Act Reporting Requirements for Accredited Continuing Medical Education (CME) Activities:
Changes in these requirements raise concerns for the unintended consequences of creating more difficulties in supporting the cutting edge educational opportunities our professional members need to maintain their excellence.

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**AMERICAN TRANSPLANT
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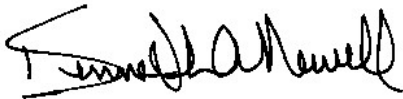
- 3) Notice and opportunity for comment before implementation of payment rates for new, revised, and potentially misvalued services and implementation of new requirements for reporting using a Qualified Clinical Data Registry (QCDR):

We join the ASTS in supporting the CMS proposals on both.

The AST strongly urges CMS to amend the Proposed Rule by addition of the proposed changes and concerns identified in these comments.

Thank you in advance for your review and consideration of our request. If you have any questions or require additional information, please do not hesitate to contact me directly or our AST government relations office at [\(202\) 258-4989](tel:2022584989).

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth Newell". The signature is written in a cursive style with a large initial "K" and "N".

Kenneth Newell, MD, PhD
President, American Society of Transplantation