

February 10, 2020

The Honorable Seema Verma, Administrator
Centers for Medicare & Medicaid Services
Department of Health & Human Services
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850
medicarephysicianfeeschedule@cms.hhs.gov



RE: Information for Future Medicare Physician Fee Schedule (MPFS) Rulemaking, Updated Spirometry Equipment

Dear Administrator Verma:

This letter is jointly submitted on behalf of the American Thoracic Society (ATS) and the American College of Chest Physicians (CHEST) Clinical Practice Committee. ATS/CHEST appreciate the opportunity to supply the Centers for Medicare & Medicaid Services (CMS) with invoices for spirometry services and our committee expert opinion.


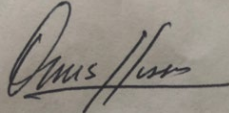
As part of our work with the AMA RUC, we supplied updated information that EQ040 and EQ043 are now obsolete equipment and those CMS inputs should be deleted. At that time, we supplied one invoice for the purchase of (3) units of the current spirometry equipment. We also noted that the invoice provided was from a large multi system hospital and was deeply discounted for equipment and not representative for the typical physician office purchase for new equipment, now CMS EQ041.

CMS Code	Category	Description	Useful Life	Price
EQ040	OTHER EQUIPMENT	Vmax 229 (spirometry testing equip, computer system)	8	50,352.98
EQ041	OTHER EQUIPMENT	Vmax 22d and 62j (PFT equip, autobox, computer system)	8	47,930.00
EQ043	OTHER EQUIPMENT	Vmax 29s (spirometry testing equip, computer system)	8	26,875.00

The ATS/CHEST committee appreciates CMS in establishing EQ041 and as we noted, we recommend that CMS crosswalk all the existing times for the varying codes with equipment EQ040 and EQ043 to the new current EQ041 equipment. Additionally we are attaching one more invoice that we were able to obtain from our membership and this invoice supports the \$47,930 CMS price.

Thank you for consideration of this additional information as you begin preparation for future rulemaking.

Sincerely,

	
Kevin Kovitz, MD	Omar Hussain, DO
American College of Chest Physicians	American Thoracic Society

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