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May 28, 2024

Chiquita Brooks-LaSure
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-4207-NC
P.O. Box 8013
Baltimore, MD 21244-8013

Shane R. Mull, M.D, MHA, FAAFP, CPC
Senior Medical Director
Palmetto GBA
Attn: Medical Affairs, AG-275
P.O. Box 100305
Columbia, SC 29202-3305

Dear Administrator Brooks-LaSure and Dr. Mull,

The Coalition of State Rheumatology Organizations (CSRO) is comprised of nearly every active state rheumatology society in the nation, representing over 40 states, with a mission of advocating for excellence in the field of rheumatology, ensuring access to the highest quality of care for the management of rheumatologic and musculoskeletal disease. Our coalition serves the practicing rheumatologist. **We are writing to formally request the retirement of the Local Coverage Article (LCA) on billing complex drug administration services (Article ID: A58527) currently published on the Palmetto GBA website.**

This request is prompted by the conflict between the guidance provided in [this LCA](#) and the directive issued by the Centers for Medicare and Medicaid Services (CMS) through [Change Request 13468](#), *Payment of Codes for Chemotherapy Administration and Nonchemotherapy Injections and Infusions*. Specifically, the CMS guidance to the Medicare Administrative Contractors (MACs) mandates the reimbursement of complex drug administration codes for rheumatologic medicines, which directly contradicts the stipulations outlined in the aforementioned LCA.

The coexistence of these contradictory documents on the MAC's website creates significant confusion for rheumatology practices, particularly as other MAC's have retired their similar LCAs following issuance of CMS' aforementioned directive. As practices strive to comply with billing regulations, they are faced with conflicting instructions, which complicates the accurate billing and administration of complex drug therapies essential for patient care.

Given the critical nature of clear and consistent billing guidelines, it is imperative that the LCA be retired to eliminate this confusion. Aligning Palmetto GBA's guidance with CMS directives and that of other MACs will facilitate smoother operations for infusion practices and ensure patients receive uninterrupted care.

Thank you for your attention to this matter. We confident that CMS and Palmetto GBA will take the necessary steps to resolve this issue promptly. Please do not hesitate to contact us at info@csro.info should you require additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gary Feldman", with a long horizontal flourish extending to the right.

Gary R. Feldman, MD, FACR
President

A handwritten signature in black ink, appearing to read "M. Feldman", with a stylized initial "M" and a horizontal flourish.

Madelaine A. Feldman, MD, FACR
Vice President, Advocacy & Government Affairs