

## SAMPLE LETTER 2

[Your institution's letterhead]

[Today's Date]

Chiquita Brooks-LaSure, MPP  
Administrator  
Centers for Medicare & Medicaid Services  
Attention: CMS-1751-P  
P.O. Box 8016  
Baltimore, MD 21244-8016

*Submitted electronically via [www.regulations.gov](http://www.regulations.gov)*

Re: 2022 CMS Proposed Reduction in Medicare Physician Fee Schedule for Cardiac  
Electrophysiology Procedures

Dear Administrator,

My name is [name] and I am a cardiac electrophysiology physician from [institution, location]. I am a member of the Heart Rhythm Society (HRS) and am writing to express my strong opposition to the substantial reduction in reimbursement for valuable cardiac electrophysiology procedures as part of the CY 2022 Medicare Physician Fee Schedule (MPFS) proposed rule.

Of particular concern are:

- **Reduction in reimbursement for CPT® Add-on codes 93657 (Treat additional AF foci) & 93655 (ablate additional arrhythmia) for AF ablation (93656)**

As you are aware, atrial fibrillation (AF) is increasing in incidence. Patient co-morbidities are also on the increase. Patients with persistent and longstanding persistent AF represents a significant proportion, are complex, and need comprehensive evaluation and additional ablation beyond pulmonary vein isolation. These proposed cuts will significantly disincentivize operators from performing additional ablation (linear, focal, and for additional arrhythmias) that is required, leading to reduced procedural success and increased re-do procedures. This will also result in increased overall healthcare utilization and can negatively impact patient safety. These cuts will also reduce the ability to innovate and tailor ablation therapies for the patient.

**The current proposed reductions in reimbursement and RVUs for AF Ablation add-on codes 93657 & 93655 as well as the MPFS conversion factor represents a significant undervaluation of EP services and is unjustifiable. This significantly limits our ability to provide adequate therapy for these complex patients. Therefore, I urge CMS to utilize the recommendations from the AMA/Specialty Society Relative Scale Update Committee.**

Thank you for your consideration.

Sincerely,  
[Your signature]