

### **Potentially Mis-valued Codes: Total Knee Arthroplasty and Total Hip Arthroplasty:**

**Background:** The 2019 Medicare Physician Fee Schedule (MPFS) Proposed Rule identified a number of CPT codes as potentially mis-valued. Among them of relevance to AAOS, were CPT codes 27130 (total hip arthroplasty) and 27447 (total knee arthroplasty). In this proposed rule, CMS had asked for comments since the agency received a public nomination for potentially overvalued codes based on the opinion that previous RUC review did not result in appropriate reductions in surveyed times and valuation for these codes. In response, the AAOS strongly disagreed with this nomination. AAOS does not believe any further action on this nomination is warranted. In 2013, the RUC and CMS reviewed and validated the now current RVU values. There is no data to indicate a change in the work of performing the procedure or the number of post-op follow up visits since that time.

Moreover, this nomination was not received during the proposed or final rule comment period and is, therefore, not publicly available in the Federal Docket Management System. The AAOS asked for transparency in these types of nominations by requiring nominations to supply the source and be submitted through the comment period.

**Current Issue:** In the 2019 MPFS Final Rule, CMS acknowledged the comments that were received regarding the seven high volume codes. CMS stated they agreed with commenters, including the original nominating stakeholder, that for many of the codes identified, including 27130 and 27447, when the codes were most recently reviewed and revalued that times were reduced substantially but the work RVU reductions were relatively less. CMS stated they are concerned with the resulting increase in the intensity of work. Hence CMS finalized these codes as potentially mis-valued and asked for further review of these high-volume codes by the RUC and other stakeholders. *CMS reiterated that the inclusion of a code on a potentially misvalued code list does not necessarily mean that a particular code is misvalued. Instead, the list is intended to prioritize codes to be reviewed under the misvalued code initiative.*

**AAOS Action:** AAOS (as previously stated) strongly disagrees that CPT codes 27130 (total hip arthroplasty) and 27447 (total knee arthroplasty) are potentially mis-valued. The action steps in this regard:

- The AAOS Coding, Coverage and Reimbursement Committee and AAOS' RUC advisors will take the lead in responding to this issue.
- AAOS will work in tandem with the affected orthopaedic specialty societies.