



Administrator

Washington, DC 20201

January 5, 2023

The Honorable Marsha Blackburn
United States Senate
Washington, DC 20510

Dear Senator Blackburn:

Thank you for your letter regarding procedure codes for breast reconstruction surgery and the role of the Centers for Medicare & Medicaid Services (CMS). I greatly appreciate you bringing your concerns to my attention.

By way of background, the Healthcare Common Procedural Coding System (HCPCS) is a standardized coding system used to identify particular items and services on claims submitted to Medicare, Medicaid, and other health insurance programs in a consistent and orderly manner. The HCPCS is divided into two principal subsystems, referred to as HCPCS Level I and HCPCS Level II. The American Medical Association (AMA) develops and maintains the HCPCS Level I codes, otherwise known as Current Procedure Terminology (CPT®) codes. CMS develops and maintains the HCPCS Level II codes, which identify items and certain services that are not identified by CPT® codes.

In 2006, CMS established HCPCS Level II code S2068 to describe breast reconstruction with Deep Inferior Epigastric Perforator (DIEP) and other flap procedures that were not at that time identified by any CPT® codes. However, in 2019, the AMA - at the request of the American Association of Plastic Surgeons - considered whether these flap procedures should be identified instead by CPT® codes. As a result of that review, the AMA revised existing CPT® code 19364 to include DIEP and other similarly advanced flap procedures. Following the revision of CPT® code 19364, CMS planned to discontinue HCPCS Level II code S2068 because the procedures identified by that code are now identified by CPT® code 19364. Following the second bi-annual public meeting in 2021 for non-drugs and non-biological items and services,¹ we discontinued code S2068 effective December 31, 2024. By doing so, we are providing more than a year for a transition period for health care providers and payers to make any necessary adjustments related to correct coding for DIEP and other similar flap procedures, and to approach the AMA, if needed, to request valuation recommendations or reexamination of CPT® coding decisions.

I appreciate your interest in this important issue. If you have any additional questions, please have your staff contact the CMS Office of Legislation at 202-690-8220. I also will provide this response to the co-signers of your letter.

Sincerely,

Chiquita Brooks-LaSure

¹ <https://www.cms.gov/medicare/coding/medhcpcsgeninfo/prior-years-cms-hcpcs-levelii-coding-decisions-narrative-summary>