American Society of Plastic Surgeons

Public comments on CMS Hospital Inpatient Prospective Payment Systems proposed rule for FY18

06/13/2017

The American Society of Plastic Surgeons (ASPS) is the world's largest organization of board-certified plastic surgeons. Representing more than 7,000 Member Surgeons, the Society is recognized as a leading authority and information source on aesthetic and reconstructive plastic surgery. ASPS comprises more than 94 percent of all board-certified plastic surgeons in the United States. Founded in 1931, the Society represents physicians certified by The American Board of Plastic Surgery or The Royal College of Physicians and Surgeons of Canada. ASPS advances quality care to plastic surgery patients by encouraging high standards of training, ethics, physician practice and research in plastic surgery.

"We would be remiss to not also ask the Agency to review current policy for breast implant placement for trans females. As we are sure you are aware, in the typical patient, estrogen therapy alone does not result in what would be considered adequate growth of breast tissue. Augmentation procedures are necessary, and should be included as a reimbursable service.

We would encourage CMS to review the nuances of CPT coding for breast prosthesis, and adjust existing policy that excludes augmentation mammoplasty (CPT 19325) as a covered service for MtF patients undergoing gender confirmation surgery."