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March 5, 2018
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Department of Health and Human Services
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Subject: Separate specialty designation for Undersea and Hyperbaric Medicine .

Dear Dr. Goodrich,
On behalf of the American College of Hyperbaric Medicine (ACHM) we are writing to request a separate specialty designation for Undersea and Hyperbaric Medicine . This letter provides the information that the Centers for Medicare and Medicaid Services (CMS) requires to evaluate these requests. Those requirements are in the Medicare Claims Processing Manual at Pub. 100-04, Chapter 26, section 10.8. (See: <http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/clm104c26.pdf>)

The American College of Hyperbaric Medicine (ACHM) is a professional society dedicated to the appropriate utilization, standards of care, training, certification, and recognition of hyperbaric medicine as a distinct medical specialty. The ACHM was formed in 1983 and is a professional non-profit membership organization representing the field of clinical hyperbaric medicine with over 4000 physicians practicing clinical hyperbaric medicine.

On behalf of this organization, we are requesting assignment of a separate specialty designation for Undersea and Hyperbaric Medicine providers. In accordance with the requirements for specialty codes as determined by the Centers for Medicare and Medicaid services, we present the following criteria and supporting details to substantiate this request.

- 1. Whether the requested specialty has the authority to bill Medicare independently**
 - a. Hyperbaric Medicine physicians are legally authorized to practice medicine and surgery in their respective states. Some hyperbaric medicine physicians have achieved board certification in the specialty through the American Board of Emergency Medicine or the American Board of Preventive Medicine, in addition to their primary board certification(s). As such, hyperbaric medicine physicians meet the definition of “physician” as defined in Section 1861(r) of the Social Security Act, and are able to bill Medicare independently for services provided to Medicare patients.

2. The requestor's stated reason or purpose for the code

- a. Undersea and Hyperbaric Medicine is a medical specialty recognized by the American Board of Medical Specialties. Undersea and Hyperbaric Medicine physicians have expertise in the use of hyperbaric oxygen therapy for the treatment of selected conditions including soft tissue and bone radiation induced necrosis, carbon monoxide poisoning, decompression sickness, and severe diabetic foot ulcers. Many physicians who practice Undersea and Hyperbaric Medicine also include wound care as part of their practice. Because of the unique qualities of this medical specialty, it is necessary to have a specialty code to identify physicians who practice this specialty. The creation of a specialty taxonomy code for Undersea and Hyperbaric Medicine will allow for enhanced identification and reporting of quality measures and other factors associated with patient outcomes and resource utilization.

3. Evidence that the practice pattern of the specialty is markedly different from that of the dominant parent specialty

- a. The parent specialties of Undersea and Hyperbaric Medicine, specifically Emergency Medicine and Preventive Medicine, are vastly different from the specialty of Hyperbaric Medicine. Hyperbaric Medicine is generally not practiced in an Emergency Department setting or in an office-based setting similar to Preventive Medicine. Undersea and Hyperbaric Medicine physicians possess a unique skill set and specialize in the treatment of selected, well-defined conditions, unlike Emergency Medicine physicians. While Preventive Medicine focuses on the prevention of disease and disability, Undersea and Hyperbaric Medicine involves the treatment of specific and already-diagnosed conditions usually provided in hospital based outpatient department (HOPD) or in Office based wound and hyperbaric centers.

4. Evidence of any specialized training and/or certification required

- a. Fellowship training in hyperbaric medicine consists of a 12-month post-residency training period. In addition, many Medicare Administrative Contractors (MACs) mandate that physicians who supervise hyperbaric oxygen therapy treatments should be board certified in hyperbaric medicine through the American Board of Emergency Medicine, the American Board of Preventive Medicine, or the American Osteopathic Conjoint Committee of Undersea and Hyperbaric Medicine, or should have completed a minimum 40-hour training course in a program approved by the American College of Hyperbaric Medicine or the Undersea and Hyperbaric Medical Society.

5. Whether the specialty treats a significant volume of the Medicare population

- a. Over 6 million people in the United States of America have chronic, nonhealing wounds. These wounds generally occur in individuals with underlying comorbidities such as advanced age, diabetes mellitus, and peripheral vascular disease. The incidence of these comorbidities increases with increasing age, and it follows that increased age is a well defined risk factor for impaired wound healing. It is therefore no surprise that a large and substantial portion of patients treated with hyperbaric oxygen therapy are Medicare beneficiaries.



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6. Whether the specialty is recognized by another organization, such as the American Board of Medical Specialties

- a. Undersea and Hyperbaric Medicine is recognized as a medical specialty by the American Board of Medical Specialties. Board Certification in Undersea and Hyperbaric Medicine is recognized by the American Board of Medical Specialties, through the American Board of Emergency Medicine and the American Board of Preventive Medicine.

7. Whether the specialty has a corresponding Healthcare Provider Taxonomy Code

- a. There are currently two taxonomy codes encompassing Hyperbaric Medicine: 2083P0011X (Preventive Medicine) and 207PE0005X (Emergency Medicine).

In conclusion, we strongly believe that Undersea and Hyperbaric Medicine physicians possess a unique skill set and practice methodology, which sets this medical subspecialty apart from the parent specialties of Emergency Medicine and Preventive Medicine. As such, we believe that a unique Taxonomy Code is necessary for practitioners of Undersea and Hyperbaric Medicine. We are requesting that you approve a separate specialty designation for the specialty of Undersea and Hyperbaric Medicine. Please feel free to contact us with any additional questions or comments regarding this request.

Sincerely,

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Dr. Kelly Johnson Arbor
Secretary and Treasurer, ACHM