

Rockson Liu, MD FACS  
Epic Care  
365 Hawthorne Ave, #101  
Oakland CA 94609

Seema Verma, MPH  
Administrator  
Centers for Medicare and Medicaid Services  
Attention: CMS01715-IFC  
PO Box 8016  
Baltimore, MD 21244-8016

**RE: Potentially Mis-valued Code; Request for Non-facility pricing of CPT Code 49436**

Dear Dr. Verma,

I am a general surgeon in Oakland, CA. I would like to bring to your attention the need to provide non-facility payment for exteriorization of an embedded peritoneal dialysis catheter.

In July 2019 and an executive order on advancing American Kidney Health was signed that encourages increased use of home dialysis. In the United States the preponderance of home dialysis is achieved through peritoneal dialysis. One of the techniques for placing peritoneal dialysis is to embed it – i.e. bury the entire catheter in the abdominal wall. When the patient is ready for dialysis, the end of the catheter is exteriorized. Embedding the catheter increases patient acceptance, reduces urgent hemodialysis catheter starts, and allows the catheter to heal in a sterile environment. Therefore, the embedding procedure should be promoted

Currently the challenge with embedding the catheter is the lack of non-facility payment. The catheter can be exteriorized in the office *safely*. However, exteriorization requires equipment, supplies and time that is not being adequately reimbursed with the current payment. Thus, I am forced to perform this procedure in a hospital or surgery center, which is more costly to the patient and very inefficient. I perform about a dozen embedding catheters a year.

I am requesting a review of CPT Code 49436 to provide for non-facility payment. Please contact me if you any questions or need for clarification.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rockson Liu', with a stylized flourish at the end.

Rockson Liu, MD FACS