

January 30, 2014

Judy Zerzan, MD, MPH  
Chief Medical Officer/Clinical Services Office Director  
Department of Health Care Policy and Financing  
1570 Grant Street  
Denver, CO 80203

Dear Dr. Zerzan:

On behalf of the Colorado Society of Eye Physicians and Surgeons (CSEPS) I want to thank you for the opportunity to provide feedback on the proposed Medicaid targeted rate increase recommendations from the Colorado Department of Health Care Policy and Financing. CSEPS represents the almost 300 ophthalmologists across Colorado and part of our mission is focused on promoting excellence in patient care and being a strong advocate for patients and the physicians who serve them. We are pleased to have a chance to advocate for a number of the proposed rate increase proposals as a way to advance eye care in Colorado.

We support the goals of the department's targeted rate increase proposals and recognize that while small these proposed increases can help guide the way to other payment and delivery system reforms not only in Medicaid but across Colorado's health care system. We support the following proposals and respectfully recommend their adoption:

- *Increase reimbursement rates for high-value specialist services* – We support this proposal as it specifically recognizes some of the undervalued eye care codes that act as a barrier to care for many patients. Colorado ophthalmologists work hard to do their share in caring for all patients equally and this proposal provides stronger incentives for ophthalmologists to treat patients in cost effective, high quality settings. There has been an unfortunate trend in other states of ophthalmologists closing their doors to Medicaid patients. As Colorado providers, we have felt lucky to be able to continue to provide for all patients and believe that this proposal will enhance access to much need eye care.
- *Increase reimbursement rates for extended hours/after hours care* – This proposal provides an opportunity for more eye care to be provided in less expensive physician practices rather than more costly urgent care centers and emergency rooms. The quality of eye care provided in an office setting where the appropriate equipment is available to a trained ophthalmologist is much higher than that available in an emergency room. When more appropriate care is provided initially, more costly follow-up care can be avoided.
- *Incentive payments to surgeons to provide care at ambulatory surgery centers (ASC)*: As eye surgeons we know that deciding where to operate has a big impact on overall costs. We are focused on providing the highest quality of care possible and this proposal advances offers the chance to utilize lower cost ASCs rather than potentially more expensive hospital settings. We support this proposal as it helps to align surgeon incentives, while sending a clear message that Medicaid is focused on buying value.
- *Increase reimbursement for pediatric developmental assessments* – Caring for children's eyes and health is a passion for many of our members. We recognize the importance of proper screening and support this low cost proposal as a way to accelerate access to necessary medical and occupational therapies for these children.
- *Increase funding for single entry point case management* – CSEPS supports case management and the critical role that single entry point providers play as part of a health



care team for long-term care patients. We believe that this modest investment will improve care, quality of life and in the long run save Medicaid precious resources.

The Colorado Society of Eye Physicians and Surgeons stands ready to work with you to advance not only these targeted rate increases but also ongoing Medicaid system transformations. We look forward to learning more about these proposals and exploring ways that we can partner with you to help ensure that Medicaid patients get the right care, at the right time, at the right time, every time.

Sincerely,



George Ulrich, MD  
President



Adrienne Ruth, MD  
Treasurer