



September 8, 2023

Centers for Medicare & Medicaid Services  
Department of Health and Human Services

**Re: ASC Payments for Calendar Year 2024**

Dear CMS:

Thank you for the opportunity to comment on the proposed Medicare rule for ASC payments. We have members who treat patients in ASCs where they provide services including using Dextenza for treatment of ocular inflammation and pain.

Our comments are focused on the need for our members to receive payment for the Dextenza insertion procedure (CPT code 68841) to ASCs. Dextenza is an important tool for management of post-surgical ocular inflammation and pain, as reflected in CMS's decision to separately pay for Dextenza as a non-opioid pain management drug. However, appropriate reimbursement is important for ASCs to be able to provide drugs like Dextenza. This includes payment for both Dextenza as well as the insertion procedure.

We worry that without appropriate payment, the ASCs where members provide services will no longer support use of Dextenza. This would be very detrimental to Medicare patients.

We ask that you please ensure that ASCs are appropriately reimbursed for their costs associated with use of Dextenza. It would help our members to provide proper care for our patients, particularly those on Medicare.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "D Schlachter". The signature is written in a cursive, flowing style.

Dianne Schlachter MD  
President  
Michigan Society of Eye Physicians and Surgeons