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February 24, 2025

Stephanie Carlton

Acting Administrator

Centers for Medicare and Medicaid Services

U.S. Department of Health and Human Services

200 Independence Avenue SW

Washington, DC 20201

RE: Request to Improve Beneficiary Access to Infectious Diseases Care

Dear Acting Administrator Carlton,

On behalf of the Infectious Diseases Society of America (IDSA), I am writing to express our sincere gratitude for the inclusion of the new infectious diseases add-on code, G0545, as part of the 2025 Medicare Physician Fee Schedule (PFS) Final Rule. The ID add-on code represents a significant step forward in recognizing the complexity and value of infectious diseases (ID) care by allowing additional reimbursement for critical services such as disease transmission risk assessment and mitigation, public health investigation and analysis, and complex antimicrobial therapy counseling.¹ These elements are essential in managing infectious diseases effectively and promoting public health.

Telehealth has proven to be an effective modality for delivering many aspects of ID care.² Telehealth facilitates access to specialized expertise, especially in rural and underserved areas where ID specialists may not be available, while supporting key public health efforts, such as antimicrobial stewardship, by enabling remote monitoring and guidance to reduce resistance and improve treatment outcomes. Telehealth also plays an important role in responding to public health emergencies by allowing rapid assessment, diagnosis and treatment while minimizing transmission risks. These capabilities not only enhance patient care but also lower health care costs and ensure needed access to essential ID services.

The addition of HCPCS code G0545, which recognizes the complexity of ID care, has further strengthened efforts to expand access to ID services. However, additional refinements to CMS policies are necessary to maximize the potential

¹ Infectious Diseases Society of America. "IDSA Advocacy Results in Big Win for ID in 2025 Final Medicare Rule." IDSA, 1 Jan. 2024, www.idsociety.org/news-publications-new/articles/2024/idsa-advocacy-results-in-big-win-for-id-in-2025-final-medicare-rule/.

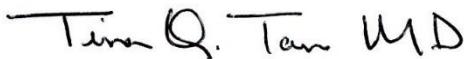
² Certintell. "The Complete CTBS Guide: Overview, Benefits & Billing." Certintell, 4 Oct. 2024, certintell.com/billing/the-complete-ctbs-guide-overview-benefits-and-billing-communication-technology-based-services/.

of telehealth in ID care. Toward that end, we respectfully request that CMS use the forthcoming CY 2026 Medicare PFS Proposed Rule to take steps that would improve access to ID care:

- **Add G0545 to the Medicare Telehealth List:** As the hospital inpatient and observation “base” codes for the ID add-on code (G0545) are currently on the Medicare Telehealth List, ID providers can perform the elements of G0545 and append it to claims when the base code is delivered via telehealth. However, to avoid confusion and prevent denials by Medicare Administrative Contractors, we request that CMS explicitly add G0545 to the Medicare Telehealth List. This step would align G0545 with other add-on codes, such as the complex care add-on code (G2211), that reflect the inherent complexity of evaluation and management (E/M) services and are already on the Medicare Telehealth List. Adding G0545 would eliminate ambiguity and ensure ID providers can confidently deliver and bill for these services remotely.
- **Permanently Add Hospital Inpatient and Observation Codes to the Medicare Telehealth List:** In addition to adding G0545 to the Medicare Telehealth List, we urge CMS to permanently include certain inpatient and observation E/M codes:
 - Initial inpatient/observation care: CPT codes 99221-99223
 - Subsequent inpatient/observation care: CPT codes 99231-99233
 - Hospital discharge day management: CPT codes 99238-99239Permanent inclusion of these codes would improve access to ID care in rural and underserved areas, enable hospitals to maintain uninterrupted care despite workforce shortages and ensure readiness during public health emergencies or other crises.
- **Allow G0545 Usage With Office and Outpatient E/M Codes:** Currently, G0545 is restricted to inpatient and observation hospital settings. However, infectious diseases care is not confined to the inpatient hospital. Expanding the list of base codes that may be used with G0545 to include office and outpatient E/M services would significantly enhance the utility of this code, allowing ID specialists to provide comprehensive care across multiple settings such as skilled nursing facilities.
- **Publish a Medicare Learning Network Article:** We request that CMS publish a Medicare Learning Network (MLN) article detailing the add-on code’s purpose, appropriate use and billing guidance. This would support CMS’ program integrity efforts and reduce erroneous use of this newly finalized code. CMS’ MLN articles are a trusted resource for providers, coders and billers, and an MLN publication would complement IDSA’s own educational efforts.

IDSA is committed to working collaboratively with CMS to improve beneficiary access to ID care and outcomes through these and other improvements. Thank you for your consideration of our request, and we look forward to answering any questions you may have.

Sincerely,

Tim Q. Tan MD

Tina Tan, MD, FIDSA, FPIDS, FAAP

President

Infectious Diseases Society of America