

April 20, 2026

Mehmet Oz, MD, MBA
Administrator
Centers for Medicare & Medicaid Services
Department of Health & Human Services

Submitted electronically via: <http://www.regulations.gov>

Dear Dr. Oz:

The undersigned organizations representing orthopaedic surgeons write to request reconsideration of the application of the -2.5% efficiency adjustment to work RVUs (wRVUs) and physician intraservice time that was implemented by CMS for CY2026 to certain CPT codes during the CY2027 Medicare Physician Fee Schedule rulemaking cycle.

Our societies strongly oppose the “efficiency adjustment” as the CMS assumption that all services become more efficient over time is not adequately supported by the data. CMS chose to move forward with the efficiency adjustment in the CY2026 MPFS Final Rule but created an exception for codes newly created for implementation in the CY2027 rule cycle. AAOS and the undersigned specialty societies respectfully request that CMS also exempt codes that were revised or existing codes that were reviewed during the 2025-2026 cycle for implementation in the CY 2027 physician fee schedule as they have already undergone timely and comprehensive study to account for efficiency. We ask that CMS approve the appropriate value that eliminates the redundant “efficiency adjustment” for the code below. CMS recognizes this problem as newly created codes are exempted from the efficiency adjustment for the CY2027 rulemaking cycle. Therefore, the codes revised or reviewed in the same cycle should also be appropriately adjusted.

The codes listed below are used by orthopaedic surgeons and were revised or reviewed this past year by the RUC which determined their times and values decreased, or the values decreased but times remained the same, leading to stable or *decreased* wRVUs. AAOS and the undersigned societies actively participate in the RUC process in good faith, including that CMS approval of or revision to RUC-recommended values is the final step in the process. Therefore, we ask CMS to complete its normal review process and exempt these codes from the efficiency adjustment alongside the newly created codes already exempted for the CY2027 rulemaking cycle.

EXISTING CPT Codes for CY2027	
CPT Code	Descriptor
27130	Arthroplasty, acetabular and proximal femoral prosthetic replacement (total hip arthroplasty), with or without autograft or allograft
27446	Arthroplasty, knee, condyle and plateau; medial OR lateral compartment

27447	Arthroplasty, knee, condyle and plateau; medial AND lateral compartments with or without patella resurfacing (total knee arthroplasty)
23470	Arthroplasty, glenohumeral joint; hemiarthroplasty
23472	Arthroplasty, glenohumeral joint; total shoulder (glenoid and proximal humeral replacement (eg, total shoulder))
63045	Laminectomy, facetectomy and foraminotomy (unilateral or bilateral with decompression of spinal cord, cauda equina and/or nerve root[s], [eg, spinal or lateral recess stenosis]), single vertebral segment; cervical
63046	Laminectomy, facetectomy and foraminotomy (unilateral or bilateral with decompression of spinal cord, cauda equina and/or nerve root[s], [eg, spinal or lateral recess stenosis]), single vertebral segment; thoracic
63047	Laminectomy, facetectomy and foraminotomy (unilateral or bilateral with decompression of spinal cord, cauda equina and/or nerve root[s], [eg, spinal or lateral recess stenosis]), single vertebral segment; lumbar
63048	Laminectomy, facetectomy and foraminotomy (unilateral or bilateral with decompression of spinal cord, cauda equina and/or nerve root[s], [eg, spinal or lateral recess stenosis]), single vertebral segment; each additional vertebral segment, cervical, thoracic, or lumbar (List separately in addition to code for primary procedure)

REVISED CPT Codes for CY2027

REVISED CPT Codes for CY2027	
CPT Code	Descriptor
20985	Computer-assisted surgical navigational procedure for musculoskeletal procedures, image-less (List separately in addition to code for primary procedure)
22210	Osteotomy of spine, posterior or posterolateral approach, 1 vertebral segment; cervical
22212	Osteotomy of spine, posterior or posterolateral approach, 1 vertebral segment; thoracic
22214	Osteotomy of spine, posterior or posterolateral approach, 1 vertebral segment; lumbar
22216	Osteotomy of spine, posterior or posterolateral approach, 1 vertebral segment; each additional vertebral segment (List separately in addition to primary procedure)
27278	Arthrodesis, sacroiliac joint, percutaneous or minimally invasive, with image guidance, includes obtaining bone graft when performed, unilateral; placement of intra-articular device(s), without cortical piercing
27279	Arthrodesis, sacroiliac joint, percutaneous or minimally invasive, with image guidance, includes obtaining bone graft when performed, unilateral; placement of transarticular device(s) and/or intra-articular device(s) piercing the lateral or medial cortices of the ilium and the lateral cortex of the sacrum
61783	Stereotactic computer-assisted (navigational) procedure; spinal (List separately in addition to code for primary procedure)

NEW CPT Codes for CY2027

NEW CPT Codes for CY2027	
CPT Code	Descriptor
209XX	Ablation therapy for bone tumor
27X05	Implantation extra-articular shock absorber, medial knee
27XX8	Osteochondral acellular scaffold implantation, knee

Thank you for your time and attention to this issue. We look forward to working closely with CMS on further improving the payment system and enhancing the care of musculoskeletal patients. Should you have questions or would like to speak with a representative of the group on this matter, please reach out to Lori Shoaf, JD, MA, AAOS Vice President of the Office of Government relations at shoaf@aaos.org.

Sincerely,

American Association for Hand Surgery (AAHS)
American Association of Hip and Knee Surgeons (AAHKS)
American Association of Orthopaedic Surgeons (AAOS)
American Orthopaedic Foot & Ankle Society (AOFAS)
American Orthopaedic Society for Sports Medicine (AOSSM)
American Shoulder and Elbow Surgeons (ASES)
American Society for Surgery of the Hand (ASSH)
Arthroscopy Association of North America (AANA)
Cervical Spine Research Society (CSRS)
J. Robert Gladden Orthopaedic Society (JRGOS)
Limb Lengthening and Reconstruction Society (LLRS)
Musculoskeletal Infection Society (MSIS)
Musculoskeletal Tumor Society (MSTS)
North American Spine Society (NASS)
Orthopaedic Trauma Association (OTA)
Pediatric Orthopaedic Society of North America (POSNA)
Ruth Jackson Orthopaedic Society (RJOS)
The Hip Society
The Knee Society