

**CLINICAL SOCIAL WORK PRACTICE ALERT**  
**HELP PREVENT A MEDICARE PROPOSED 14 PERCENT FEE REDUCTION**  
**FOR CLINICAL SOCIAL WORKERS WHO ARE MEDICARE PROVIDERS**

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The Centers for Medicare and Medicaid Services (CMS) issued a proposed notice in the *Federal Register*, dated June 29, 2006, that addresses two components of the Medicare Physician Fee Schedule: the RVU (work) and the Practice Expense values. Clinical social workers' reimbursement fees are based on this schedule. CMS is proposing that clinical social workers receive a 7 percent reduction in work values and a 2 percent reduction in Practice Expense values effective January 1, 2007. An additional proposed 5 percent decrease in Practice Expense values is to occur by 2010. Thus, the total reduction in reimbursement is expected to be 14 percent by 2010 for clinical social workers--one of the highest reductions of all covered professions. On the other hand, CMS is proposing a 10 percent increase in reimbursement for evaluation and management codes, which generally are restricted to physician use and not for clinical social workers or other non-physician practitioners.

CMS considers comment letters that are not duplicated when making final decisions about proposed notices. NASW is responding to the proposed notice on the Physician Fee Schedule and is requesting your assistance in sending additional comments to CMS about the proposed changes for clinical social workers. Comments are due August 21, 2006. Tips for comments include:

- Inform CMS how a 14 percent reimbursement cut will affect your practice and you as a Medicare provider;
- Request CMS not to reduce work values for clinical social workers effective January 1, 2007;
- Request CMS to withdraw the proposed increase in evaluation and management codes until they have the funds to increase reimbursement for all Medicare providers; and
- Request CMS not to approve the proposed "bottom up" formula to calculate practice expense. Request CMS to select a formula that does not create a negative impact for clinical social workers who have very little practice expense as providers.

Comments may be sent electronically or by mail and must be received by 5:00 p.m. EDT on August 21, 2006. In commenting, please refer to file code CMS-1512-PN. The addresses are:

1. Electronic:  
<http://www.cms.hhs.gov/eRulemaking/ECCMSR/itemdetail.asp?filterType=non&filterByDID=0&sortByDID=3&sortOrder=ascending&itemID=CMS1184425> Attachments should be in Microsoft Word, WordPerfect, or Excel.
2. Regular mail: Department of Health and Human Services, Attention: CMS-1512-PN, PO Box 8014, Baltimore, MD 21244-8014.
3. Express or Overnight Mail: Department of Health and Human Services, Attention: CMS-1512-PN, Mail Stop C4-16-05, 7500 Security Boulevard, Baltimore, MD 21244-1850.

Questions to NASW about the proposed notice may be sent to [mcoleman@naswdc.org](mailto:mcoleman@naswdc.org)  
Additional information about this notice can found at <http://www.cms.hhs.gov>