

Submitter : Lynn Canavan
Organization : Texas Breast Surgeons
Category : Physician

Date: 09/20/2006

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1321-P-212-Attach-1.DOC

Submitter : Rebecca Knight
Organization : Foothills Surgical Associates, PC
Category : Physician

Date: 09/20/2006

Issue Areas/Comments

GENERAL

GENERAL

September 14, 2006

Office of the Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Attention: CMS-1321-P; Medicare Program; Revisions to Payment Policies under the Physician Fee Schedule for Calendar Year 2007 and Other Changes to Payment under Part B

Dear Administrator:

Thank you for allowing me the opportunity to provide comment on the Centers for Medicare and Medicaid Services proposed rule (CMS-1321-P), published in the Federal Register on August 22, 2006.

By reducing the RVU s for CPT 19296, CMS will cause unnecessary challenges in scheduling Medicare beneficiaries for surgery at the hospital because the facility may decline to offer the service altogether the catheter is priced higher than the proposed clinical APC payment rate. As a result, many Medicare beneficiaries diagnosed with breast cancer will be denied access to this safe and effective means of delivering radiation therapy.

In order for me to continue to provide access and availability of this hospital outpatient procedure for Medicare beneficiaries, I am requesting that CMS stabilize or freeze the current RVU s for CPT 19296.

It is imperative this hospital outpatient procedure be available to those women who are clinically eligible to receive BCS and are being offered APBI as a treatment option by their physician.

Sincerely,

Rebecca Knight, MD

Rebecca Knight, MD
Foothills Surgical Associates, PC
3555 Lutheran Pkwy., Ste. 380
Wheat Ridge, CO 80033
(303) 940-8200

Cc: Representative Diana DeGette, Energy and Commerce Health Subcommittee
Carol Bazell, MD, MPH, Director, Division of Outpatient Care
Helen Pass, MD, President, American Society of Breast Surgeons
Mark A. Malangoni, MD, FACS, Chair, American College of Surgeons

Submitter : Christine Rogness
Organization : Foothills Surgical Associates, PC
Category : Physician

Date: 09/20/2006

Issue Areas/Comments

GENERAL

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September 14, 2006

Office of the Administrator
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In order for me to continue to provide access and availability of this procedure in my office for Medicare beneficiaries, I am requesting that CMS stabilize or freeze the current RVU s for CPT 19296.

Thank you for your careful consideration of the impact your decision will make on Medicare beneficiaries with regard to access to this very important procedure in the treatment of breast cancer. I urge you to reconsider your proposal or run the risk of severely limiting access to partial breast irradiation for Medicare beneficiaries.

Sincerely,

Christine D. Rogness, MD

Christine D. Rogness, MD
Foothills Surgical Associates, PC
3555 Lutheran Pkwy., Ste. 380
Wheat Ridge, CO 80033
(303) 940-8200

Cc: Representative Diana DeGette, Energy and Commerce Health Subcommittee
Carolyn Mullen, Deputy Director, Division of Practitioner Services
Helen Pass, MD, President, American Society of Breast Surgeons
Mark A. Malangoni, MD, FACS, Chair, American College of Surgeons

Submitter : Christine Rogness
Organization : Foothills Surgical Associates, PC
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Christine D. Rogness, MD

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Foothills Surgical Associates, PC
3555 Lutheran Pkwy., Ste. 380
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Carol Bazell, MD, MPH, Director, Division of Outpatient Care
Helen Pass, MD, President, American Society of Breast Surgeons
Mark A. Malangoni, MD, FACS, Chair, American College of Surgeons

Submitter : Rebecca Wiebe
Organization : Foothills Surgical Associates, PC
Category : Physician

Date: 09/20/2006

Issue Areas/Comments

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Sincerely,

Rebecca Wiebe, MD

Rebecca Wiebe, MD
Foothills Surgical Associates, PC
3555 Lutheran Pkwy., Ste. 380
Wheat Ridge, CO 80033
(303) 940-8200

Cc: Representative Diana DeGette, Energy and Commerce Health Subcommittee
Carolyn Mullen, Deputy Director, Division of Practitioner Services
Helen Pass, MD, President, American Society of Breast Surgeons
Mark A. Malangoni, MD, FACS, Chair, American College of Surgeons

Submitter : Ms. Jeani Thomas
Organization : Our Lady of Bellefonte Hospital
Category : Nurse Practitioner

Date: 09/20/2006

Issue Areas/Comments

Background

Background

I am greatly concerned about the coverage of bone mass measurements and more specifically the use of DXA for our elderly population. It is imperative that you realize that 1 out of 4 women who fracture a hip will never return to fully be able to perform the activities of daily living. That means they may no longer be able to drive, go to the grocery, or post office, or make supper for their elderly spouse. Taking away this most valuable preventative service by reducing the reimbursement will greatly harm women who could continue to be productive elderly employees, wives, mothers, and grandmothers.

Your methodology should not be a trial and error policy but should fully fund the use of DXA to identify a person's risk of hip fracture. Please don't refuse to see the benefit of DXA in the treatment of osteoporosis. The disease won't go away just because you will no longer pay for it. I would encourage Congress to act on this before their October adjournment.

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Submitter : Rebecca Wiebe
Organization : Foothills Surgical Assoc., PC
Category : Physician

Date: 09/20/2006

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Rebecca Wiebe, MD
Foothills Surgical Associates, PC
3555 Lutheran Pkwy., Ste. 380
Wheat Ridge, CO 80033
(303) 940-8200

Cc: Representative Diana DeGette, Energy and Commerce Health Subcommittee
Carol Bazell, MD, MPH, Director, Division of Outpatient Care
Helen Pass, MD, President, American Society of Breast Surgeons
Mark A. Malangoni, MD, FACS, Chair, American College of Surgeons

Submitter : Elizabeth Brew
Organization : Foothills Surg. Assoc., PC
Category : Physician

Date: 09/20/2006

Issue Areas/Comments

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Sincerely,

Elizabeth Brew, MD

Elizabeth Brew, MD
Foothills Surgical Associates, PC
3555 Lutheran Pkwy., Ste. 380
Wheat Ridge, CO 80033
(303) 940-8200

Cc: Representative Diana DeGette, Energy and Commerce Health Subcommittee
Carolyn Mullen, Deputy Director, Division of Practitioner Services
Helen Pass, MD, President, American Society of Breast Surgeons
Mark A. Malangoni, MD, FACS, Chair, American College of Surgeons

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Sincerely,

Elizabeth Brew, MD

Elizabeth Brew, MD
Foothills Surgical Associates, PC
3555 Lutheran Pkwy., Ste. 380
Wheat Ridge, CO 80033
(303) 940-8200

Cc: Representative Diana DeGette, Energy and Commerce Health Subcommittee
Carol Bazell, MD, MPH, Director, Division of Outpatient Care
Helen Pass, MD, President, American Society of Breast Surgeons
Mark A. Malangoni, MD, FACS, Chair, American College of Surgeons

Submitter : Philip Neff
Organization : Foothills Surg. Assoc., PC
Category : Physician

Date: 09/20/2006

Issue Areas/Comments

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Sincerely,

Philip Neff, MD

Philip Neff, MD
Foothills Surgical Associates, PC
3555 Lutheran Pkwy., Ste. 380
Wheat Ridge, CO 80033
(303) 940-8200

Cc: Representative Diana DeGette, Energy and Commerce Health Subcommittee
Carolyn Mullen, Deputy Director, Division of Practitioner Services
Helen Pass, MD, President, American Society of Breast Surgeons
Mark A. Malangoni, MD, FACS, Chair, American College of Surgeons

Submitter : Philip Neff
Organization : Foothills Surg. Assoc., PC
Category : Physician

Date: 09/20/2006

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Sincerely,

Philip Neff, MD

Philip Neff, MD
Foothills Surgical Associates, PC
3555 Lutheran Pkwy., Ste. 380
Wheat Ridge, CO 80033
(303) 940-8200

Cc: Representative Diana DeGette, Energy and Commerce Health Subcommittee
Carol Bazell, MD, MPH, Director, Division of Outpatient Care
Helen Pass, MD, President, American Society of Breast Surgeons
Mark A. Malangoni, MD, FACS, Chair, American College of Surgeons

Submitter : Dr. J. William Follows
Organization : NWIA Bone, Joint & Sports Surgeons
Category : Physician

Date: 09/20/2006

Issue Areas/Comments

Background

Background

The proposed cuts will negatively impact our practice in its efforts to recruit & retain physicians in Iowa. Our practice relies heavily on the added revenue for performing diagnostic imaging services within our own practice.

GENERAL

GENERAL

Please delay this measure until further investigations can be made.

Submitter : Dr. Rick Wilkerson
Organization : NWIA Bone, Joint & Sports Surgeons
Category : Physician

Date: 09/20/2006

Issue Areas/Comments

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The proposed cuts will negatively impact our practice in its efforts to recruit & retain physicians in Iowa. Our practice relies heavily on the added revenue for performing diagnostic imaging services within our own practice.

GENERAL

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Please delay this action until further investigation can be performed.

Submitter : Dr. Philip Deffer
Organization : NWIA Bone, Joint & Sports Surgeons
Category : Physician

Date: 09/20/2006

Issue Areas/Comments

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GENERAL

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Please delay action on this proposal until further investigation can be performed.

Submitter : Dr. Stephen Frushour
Organization : NWIA Bone, Joint & Sports Surgeons
Category : Physician

Date: 09/20/2006

Issue Areas/Comments

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Background

The proposed cuts will negatively impact our practice in its efforts to recruit & retain physicians in Iowa. Our practice relies heavily on the added revenue for performing diagnostic imaging services within our own practice.

GENERAL

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Submitter : Miss. Jennifer Hansen
Organization : NWIA Bone, Joint & Sports Surgeons
Category : Physician Assistant

Date: 09/20/2006

Issue Areas/Comments

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Please delay action on this until further investigation can be done.

Submitter : Dr. Jason Hough
Organization : NWIA Bone, Joint & Sports Surgeons
Category : Physician

Date: 09/20/2006

Issue Areas/Comments

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Please delay decision on this until further investigation can be done.

Submitter : Janine Meza

Date: 09/20/2006

Organization : Janine Meza

Category : Physician

Issue Areas/Comments

GENERAL

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See Attachment

CMS-1321-P-229-Attach-1.DOC

September 14, 2006

Office of the Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

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Sincerely,

Janine Meza, MD

Janine Meza, MD
1601 E. 19th Ave
Denver, CO 80218
(303) 226-7400

Cc: Representative Diana DeGette, Energy and Commerce Health
Subcommittee
Carolyn Mullen, Deputy Director, Division of Practitioner Services
Helen Pass, MD, President, American Society of Breast Surgeons
Mark A. Malangoni, MD, FACS, Chair, American College of Surgeons

Submitter : Janine Meza

Date: 09/20/2006

Organization : Janine Meza

Category : Physician

Issue Areas/Comments

GENERAL

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See Attachment

CMS-1321-P-230-Attach-1.DOC

Attach #

230

September 14, 2006

Office of the Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

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Sincerely,

Janine Meza, MD

Janine Meza, MD
1601 E. 19th Ave
Denver, CO 80218
(303) 226-7400

Cc: Representative Diana DeGette, Energy and Commerce Health
Subcommittee
Carol Bazell, MD, MPH, Director, Division of Outpatient Care
Helen Pass, MD, President, American Society of Breast Surgeons
Mark A. Malangoni, MD, FACS, Chair, American College of Surgeons

Submitter : Kerri Perry
Organization : Kerri Perry
Category : Physician

Date: 09/20/2006

Issue Areas/Comments

GENERAL

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See Attachment

CMS-1321-P-231-Attach-1.DOC

HHG/117
231

September 15, 2006

Office of the Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Mail Stop C4-26-05
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Sincerely,

Kerri Perry, MD

Kerri Perry, MD
2817 South Mayhill Rd., Ste. 270
Denton, TX 76208
(940) 243-9759

Cc: Senator Kay Bailey Hutchison, Senate Appropriations Labor-HHS
Subcommittee
Representative Joe Barton, Chairman, Energy and Commerce Committee
Representative Michael Burgess, Energy and Commerce Health
Subcommittee
Representative Kay Granger, Appropriations Labor-HHS Subcommittee
Carolyn Mullen, Deputy Director, Division of Practitioner Services
Helen Pass, MD, President, American Society of Breast Surgeons
Mark A. Malangoni, MD, FACS, Chair, American College of Surgeons

Submitter : Kerri Perry
Organization : Kerri Perry
Category : Physician

Date: 09/20/2006

Issue Areas/Comments

GENERAL

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See Attachment

CMS-1321-P-232-Attach-1.DOC

September 15, 2006

Office of the Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Mail Stop C4-26-05
7500 Security Boulevard
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Kerri Perry, MD
2817 South Mayhill Rd., Ste. 270
Denton, TX 76208
(940) 243-9759

Cc: Senator Kay Bailey Hutchison, Senate Appropriations Labor-HHS
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Representative Joe Barton, Chairman, Energy and Commerce
Committee
Representative Michael Burgess, Energy and Commerce Health
Subcommittee
Representative Kay Granger, Appropriations Labor-HHS
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Carol Bazell, MD, MPH, Director, Division of Outpatient Care
Helen Pass, MD, President, American Society of Breast Surgeons
Mark A. Malangoni, MD, FACS, Chair, American College of Surgeons

Submitter : Mark Dickson

Date: 09/20/2006

Organization : Mark Dickson

Category : Physician

Issue Areas/Comments

GENERAL

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See Attachment

CMS-1321-P-233-Attach-1.DOC

September 16, 2006

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By reducing the RVU's for CPT 19296, CMS will significantly limit the number of Medicare beneficiaries who will receive this important procedure in my office. As a result, many Medicare beneficiaries will have to schedule this procedure in the hospital, which will burden the Medicare system with unnecessary costs, as well as impede/delay the treatment process of Medicare beneficiaries diagnosed with breast cancer. These patients must undergo catheter implantation and radiation therapy as quickly as possible.

In order for me to continue to provide access and availability of this procedure in my office for Medicare beneficiaries, I am requesting that CMS stabilize or freeze the current RVU's for CPT 19296.

Thank you for your careful consideration of the impact your decision will make on Medicare beneficiaries with regard to access to this very important procedure in the treatment of breast cancer. I urge you to reconsider your proposal or run the risk of severely limiting access to partial breast irradiation for Medicare beneficiaries.

Sincerely,

Mark Dickson, MD

Mark Dickson, MD
1014 Memorial, Ste 208
Denison, TX 75020
(903) 416-6240

Cc: Senator Kay Bailey Hutchison, Senate Appropriations Labor-HHS
Subcommittee
Representative Joe Barton, Chairman, Energy and Commerce Committee
Representative Michael Burgess, Energy and Commerce Health
Subcommittee
Representative Kay Granger, Appropriations Labor-HHS Subcommittee
Carolyn Mullen, Deputy Director, Division of Practitioner Services
Helen Pass, MD, President, American Society of Breast Surgeons
Mark A. Malangoni, MD, FACS, Chair, American College of Surgeons

Submitter : Mark Dickson

Date: 09/20/2006

Organization : Mark Dickson

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1321-P-234-Attach-1.DOC

September 16, 2006

Office of the Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Attention: CMS-1321-P; Medicare Program; Revisions to Payment Policies
under the Physician Fee Schedule for Calendar Year 2007 and Other
Changes to Payment under Part B

Dear Administrator:

Thank you for allowing me the opportunity to provide comment on the
Centers for Medicare and Medicaid Services' proposed rule (CMS-1321-P),
published in the Federal Register on August 22, 2006.

By reducing the RVU's for CPT 19296, CMS will cause unnecessary
challenges in scheduling Medicare beneficiaries for surgery at the
hospital because the facility may decline to offer the service
altogether - the catheter is priced higher than the proposed clinical
APC payment rate. As a result, many Medicare beneficiaries diagnosed
with breast cancer will be denied access to this safe and effective
means of delivering radiation therapy.

In order for me to continue to provide access and availability of this
hospital outpatient procedure for Medicare beneficiaries, I am
requesting that CMS stabilize or freeze the current RVU's for CPT
19296.

It is imperative this hospital outpatient procedure be available to
those women who are clinically eligible to receive BCS and are being
offered APBI as a treatment option by their physician.

Sincerely,

Mark Dickson, MD

Mark Dickson, MD
1014 Memorial, Ste 208
Denison, TX 75020
(903) 416-6240

Cc: Senator Kay Bailey Hutchison, Senate Appropriations Labor-HHS
Subcommittee
Representative Joe Barton, Chairman, Energy and Commerce
Committee
Representative Michael Burgess, Energy and Commerce Health
Subcommittee
Representative Kay Granger, Appropriations Labor-HHS
Subcommittee
Carol Bazell, MD, MPH, Director, Division of Outpatient Care
Helen Pass, MD, President, American Society of Breast Surgeons
Mark A. Malangoni, MD, FACS, Chair, American College of Surgeons

Submitter : Alison Laidley
Organization : Breast Surgeons of N. TX
Category : Physician

Date: 09/20/2006

Issue Areas/Comments

GENERAL

GENERAL

Sec Attachment

CMS-1321-P-235-Attach-1.DOC

September 18, 2006

Office of the Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Attention: CMS-1321-P; Medicare Program; Revisions to Payment Policies
under the Physician Fee Schedule for Calendar Year 2007 and Other Changes
to Payment under Part B

Dear Administrator:

Thank you for allowing me the opportunity to provide comment on the Centers for Medicare and Medicaid Services' proposed rule (CMS-1321-P), published in the Federal Register on August 22, 2006.

By reducing the RVU's for CPT 19296, CMS will significantly limit the number of Medicare beneficiaries who will receive this important procedure in my office. As a result, many Medicare beneficiaries will have to schedule this procedure in the hospital, which will burden the Medicare system with unnecessary costs, as well as impede/delay the treatment process of Medicare beneficiaries diagnosed with breast cancer. These patients must undergo catheter implantation and radiation therapy as quickly as possible.

In order for me to continue to provide access and availability of this procedure in my office for Medicare beneficiaries, I am requesting that CMS stabilize or freeze the current RVU's for CPT 19296.

Thank you for your careful consideration of the impact your decision will make on Medicare beneficiaries with regard to access to this very important procedure in the treatment of breast cancer. I urge you to reconsider your proposal or run the risk of severely limiting access to partial breast irradiation for Medicare beneficiaries.

Sincerely,

Alison Laidley, MD

Alison Laidley, MD
7777 Forest Lane, Ste. C-614
Dallas, TX 75230
(972) 566-7499

Cc: Senator Kay Bailey Hutchison, Senate Appropriations Labor-HHS
Subcommittee
Representative Joe Barton, Chairman, Energy and Commerce Committee
Representative Michael Burgess, Energy and Commerce Health
Subcommittee
Representative Kay Granger, Appropriations Labor-HHS Subcommittee
Carolyn Mullen, Deputy Director, Division of Practitioner Services
Helen Pass, MD, President, American Society of Breast Surgeons
Mark A. Malangoni, MD, FACS, Chair, American College of Surgeons

Submitter : Alison Laidley
Organization : Breast Surgeons of N. TX
Category : Physician

Date: 09/20/2006

Issue Areas/Comments

GENERAL

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See Attachment

CMS-1321-P-236-Attach-1.DOC

September 18, 2006

Office of the Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Attention: CMS-1321-P; Medicare Program; Revisions to Payment Policies under the Physician Fee Schedule for Calendar Year 2007 and Other Changes to Payment under Part B

Dear Administrator:

Thank you for allowing me the opportunity to provide comment on the Centers for Medicare and Medicaid Services' proposed rule (CMS-1321-P), published in the Federal Register on August 22, 2006.

By reducing the RVU's for CPT 19296, CMS will cause unnecessary challenges in scheduling Medicare beneficiaries for surgery at the hospital because the facility may decline to offer the service altogether - the catheter is priced higher than the proposed clinical APC payment rate. As a result, many Medicare beneficiaries diagnosed with breast cancer will be denied access to this safe and effective means of delivering radiation therapy.

In order for me to continue to provide access and availability of this hospital outpatient procedure for Medicare beneficiaries, I am requesting that CMS stabilize or freeze the current RVU's for CPT 19296.

It is imperative this hospital outpatient procedure be available to those women who are clinically eligible to receive BCS and are being offered APBI as a treatment option by their physician.

Sincerely,

Alison Laidley, MD

Alison Laidley, MD
7777 Forest Lane, Ste. C-614
Dallas, TX 75230
(972) 566-7499

Cc: Senator Kay Bailey Hutchison, Senate Appropriations Labor-HHS
Subcommittee
Representative Joe Barton, Chairman, Energy and Commerce
Committee
Representative Michael Burgess, Energy and Commerce Health
Subcommittee
Representative Kay Granger, Appropriations Labor-HHS
Subcommittee
Carol Bazell, MD, MPH, Director, Division of Outpatient Care
Helen Pass, MD, President, American Society of Breast Surgeons
Mark A. Malangoni, MD, FACS, Chair, American College of Surgeons

Submitter : Louis Munoz
Organization : Texas Cancer Center at Medical City Dallas
Category : Physician

Date: 09/20/2006

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1321-P-237-Attach-1.DOC

September 18, 2006

Office of the Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Attention: CMS-1321-P; Medicare Program; Revisions to Payment Policies under the Physician Fee Schedule for Calendar Year 2007 and Other Changes to Payment under Part B

Dear Administrator:

Thank you for allowing me the opportunity to provide comment on the Centers for Medicare and Medicaid Services' proposed rule (CMS-1321-P), published in the Federal Register on August 22, 2006.

By reducing the RVU's for CPT 77781, in addition to reducing the conversion factor, CMS will significantly cripple my ability to offer the full scope of radiation services to Medicare beneficiaries. As a result, many Medicare beneficiaries will have to schedule brachytherapy services in the hospital radiation center, which will impede/delay the treatment process of Medicare beneficiaries diagnosed with breast or prostate cancer and burden the Medicare system with unnecessary costs compared to the cost-effective efficiencies of a free-standing radiation center.

In order for me to continue to provide access and availability of these radiation services to Medicare beneficiaries in this free-standing radiation center, I am requesting that CMS stabilize or freeze the current RVU's for CPT 77781.

Thank you for your careful consideration of the impact your decision will make on Medicare beneficiaries with regard to access to these very important radiation services in the treatment of breast and prostate cancer. I urge you to reconsider your proposal or run the risk of severely limiting access to brachytherapy services for Medicare beneficiaries.

Sincerely,

Louis Munoz, MD

Louis Munoz, MD
Texas Cancer Center at Medical City Dallas
7777 Forest Lane, Ste. D-110
Dallas, TX 75230
(972) 566-7031

Cc: Senator Kay Bailey Hutchison, Senate Appropriations Labor-HHS Subcommittee
Representative Joe Barton, Chairman, Energy and Commerce Committee
Representative Michael Burgess, Energy and Commerce Health Subcommittee
Representative Kay Granger, Appropriations Labor-HHS Subcommittee
Carolyn Mullen, Deputy Director, Division of Practitioner Services
W. Robert Lee, MD, President, American Brachytherapy Society
James Rubenstein, MD, Chairman, American College of Radiation Oncology
Prabhakar Tripuraneni, M.D., Chair, American Society of Therapeutic Radiation
and Oncology