

CMS-1385-P-1976

Submitter : Dr. Eric Lorr

Date: 07/13/2007

Organization : ASMG

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

Thank you for proposing CMS-1385-P. These changes are long overdue. The American people deserve the best healthcare in the world, and CMS-1385-P goes a long way to ensuring it. This will help prevent some of the brightest minds in America from leaving medicine in search of other more lucrative fields (e.g. law, business, computer technology, etc.).

Thank you,

Eric Lorr, M.D.

Submitter : Dr. Philip Knox

Date: 07/13/2007

Organization : ASA

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

Leslic V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
P.O. Box 8018
Baltimore, MD 21244-8018

Re: CMS-1385-P
Anesthesia Coding (Part of 5-Year Review)

Dear Ms. Norwalk:

I am writing to express my strongest support for the proposal to increase anesthesia payments under the 2008 Physician Fee Schedule. I am grateful that CMS has recognized the gross undervaluation of anesthesia services, and that the Agency is taking steps to address this complicated issue.

When the RBRVS was instituted, it created a huge payment disparity for anesthesia care, mostly due to significant undervaluation of anesthesia work compared to other physician services. Today, more than a decade since the RBRVS took effect, Medicare payment for anesthesia services stands at just \$16.19 per unit. This amount does not cover the cost of caring for our nation's seniors, and is creating an unsustainable system in which anesthesiologists are being forced away from areas with disproportionately high Medicare populations.

In an effort to rectify this untenable situation, the RUC recommended that CMS increase the anesthesia conversion factor to offset a calculated 32 percent work undervaluation a move that would result in an increase of nearly \$4.00 per anesthesia unit and serve as a major step forward in correcting the long-standing undervaluation of anesthesia services. I am pleased that the Agency accepted this recommendation in its proposed rule, and I support full implementation of the RUC's recommendation.

To ensure that our patients have access to expert anesthesiology medical care, it is imperative that CMS follow through with the proposal in the Federal Register by fully and immediately implementing the anesthesia conversion factor increase as recommended by the RUC.

Thank you for your consideration of this serious matter.

Submitter :

Date: 07/13/2007

Organization :

Category : Physician

Issue Areas/Comments

GENERAL

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Acting Administrator
Centers for Medicare and Medicaid Services
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Thank you for your consideration of this serious matter.

Ines P. Koerner, MD, PhD

Submitter : Dr. Terry McGraw
Organization : Oregon Health & Science University
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

GENERAL

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Submitter : Dr. marco robin

Date: 07/13/2007

Organization : accmg

Category : Physician

Issue Areas/Comments

GENERAL

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Thank you for your consideration of this serious matter.

Sincerely,

Marco Robin DO

Submitter : Dr. Andre-Paul Michaud

Date: 07/13/2007

Organization : OHSU

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

Increasing medicare reimbursement for academic anesthesiology depts by allowing each attending to bill for both rooms will help guarantee society better physicians well trained by academicians vested in the teaching institution

Submitter : Dr. Ellis Lai
Organization : General Anesthesia Specialists Partners
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

GENERAL

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Acting Administrator
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Thank you for your consideration of this serious matter.

Sincerely,

Ellis Lai, M.D.

Submitter : Dr. Annemarie Thompson
Organization : Vanderbilt University Department of Anesthesia
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

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Thank you for your consideration of this serious matter.

Sincerely yours,

Annemarie Thompson, MD
Assistant Professor, Vanderbilt University Medical Center

Submitter : Dr. Tracy Strandhagen
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

GENERAL

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Anesthesia coding

I strongly support the proposal to increase anesthesia payments under the 2008 Physician Fee Schedule. I am grateful CMS has recognized the underpayment of our services.

At the current rate, it is difficult to provide care in any area with a large percentage of Medicare patients. This leads to these areas being underserved and unable to attract doctors. I fully support the RUC's recommendation to increase each anesthesia unit and allow our seniors to have access to the quality health care they deserve.

I would urge CMS to follow through with the proposal in the Federal Register by immediately implementing the anesthesia conversion factor increase as recommended by the RUC.

Thank you for your assistance in this critical matter.

Submitter : Dr. Jonathan Zucker
Organization : Jonathan R. Zucker, M.D.
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

**Coding-- Additional Codes From
5-Year Review**

Coding-- Additional Codes From 5-Year Review

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
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P.O. Box 8018
Baltimore, MD 21244-8018

Re: CMS-1385-P
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Sincerely,
Jonathan R. Zucker, MD

CMS-1385-P-1985-Attach-1.DOC

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
P.O. Box 8018
Baltimore, MD 21244-8018

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Thank you for your consideration of this serious matter.

Sincerely,
Jonathan R. Zucker, MD

Submitter : Millicent Khaw
Organization : Millicent Khaw
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

GENERAL

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Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
P.O. Box 8018
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Rc: CMS-1385-P

Anesthesia Coding (Part of 5-Year Review)

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Submitter : Dr. Andrew Grimes

Date: 07/13/2007

Organization : Dr. Andrew Grimes

Category : Physician

Issue Areas/Comments

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Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
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Thank you for your consideration of this serious matter.

Submitter : Dr. Lee Wesner
Organization : Rhode Island Hospital
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

GENERAL

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Centers for Medicare and Medicaid Services
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Submitter : Dr. Stephen A. Klem MD

Date: 07/13/2007

Organization : Dr. Stephen A. Klem MD

Category : Physician

Issue Areas/Comments

GENERAL

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RBRVS created a huge payment disparity for anesthesia care, mostly due to significant undervaluation of anesthesia work compared to other physician services. Today, Medicare payment for anesthesia services stands at just \$16.19 per unit. This amount does not cover the cost of caring for our nation's seniors (including appropriate overhead and malpractice coverage), and is creating an unsustainable system in which anesthesiologists are being forced away from areas with disproportionately high Medicare populations.

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Thank you for your consideration of this matter.

Submitter : Dr. Timothy Lubenow
Organization : Rush University Medical Center
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

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July 13, 2007
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Acting Administrator
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Submitter : Dr. Michael Lee

Date: 07/13/2007

Organization : Dr. Michael Lee

Category : Physician

Issue Areas/Comments

**Payment For Procedures And
Services Provided In ASCs**

Payment For Procedures And Services Provided In ASCs

July 12, 2007

Leslie V. Norwalk, Esq.

Acting Administrator

Centers for Medicare and Medicaid Services

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Michael Lee, M.D.

Submitter : Dr. Brian Williams
Organization : University of Pittsburgh
Category : Physician

Date: 07/13/2007

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Thank you for your consideration of this serious matter.

Brian Williams, MD, MBA
Associate Professor of Anesthesiology
University of Pittsburgh

Submitter : Dr. Alan Kaplan
Organization : Northside Hospital
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

GENERAL

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Submitter : Dr. Rob Introna
Organization : Northside Hospital
Category : Physician

Date: 07/13/2007

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In an effort to rectify this untenable situation, the RUC recommended that CMS increase the anesthesia conversion factor to offset a calculated 32 percent work undervaluation a move that would result in an increase of nearly \$4.00 per anesthesia unit and serve as a major step forward in correcting the long-standing undervaluation of anesthesia services. I am pleased that the Agency accepted this recommendation in its proposed rule, and I support full implementation of the RUC's recommendation.

To ensure that our patients have access to expert anesthesiology medical care, it is imperative that CMS follow through with the proposal in the Federal Register by fully and immediately implementing the anesthesia conversion factor increase as recommended by the RUC.

Thank you for your consideration of this serious matter.

Submitter : Dr. Jesse Ehrenfeld
Organization : Dr. Jesse Ehrenfeld
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

GENERAL

GENERAL

Re: CMS-1385-P
Anesthesia Coding (Part of 5-Year Review)

Dear Ms. Norwalk:

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Thank you for your consideration of this serious matter.

-Jesse Ehrenfeld, M.D.
Massachusetts General Hospital

Submitter :

Date: 07/13/2007

Organization :

Category : Physician

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
P.O. Box 8018
Baltimore, MD 21244-8018

Re: CMS-1385-P
Anesthesia Coding (Part of 5-Year Review)

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Submitter : Dr. Andra Duncan

Date: 07/13/2007

Organization : Cleveland Clinic

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
P.O. Box 8018
Baltimore, MD 21244-8018

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Thank you for your consideration of this serious matter.

Andra Duncan, M.D.
Department of Cardiothoracic Anesthesia
Cleveland Clinic
Cleveland, OH

Submitter : Dr. Amish Patel

Date: 07/13/2007

Organization : ASA

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

I fully support the proposed increase in payments for anesthesiologists in 2008. It has been apparent for a long time to a lot of people in the field that the compensation for services rendered have been suboptimal and this is definitely a step in the right direction

Submitter : Mr. Chad Chandler
Organization : Southeast Al. Medical Center
Category : Other Health Care Professional

Date: 07/13/2007

Issue Areas/Comments

**Coding-- Additional Codes From
5-Year Review**

Coding-- Additional Codes From 5-Year Review

Chad M. Chandler, CRNA
Attention: CMS-1385-P
145 Spring Hill Road
Dothan, Al. 36301

Re: CMS-1385-P
Anesthesia Coding (Part of 5-Year Review)

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Thank you for your consideration of this serious matter.

Submitter : Dr. Andrew Miller

Date: 07/13/2007

Organization : Dr. Andrew Miller

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
P.O. Box 8018
Baltimore, MD 21244-8018

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