

Submitter : Dr. Barry Wortham
Organization : Tejas Anesthesia, P.A.
Category : Physician

Date: 07/13/2007

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

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 : Dr. John Shepherd
Organization : Tejas Anesthesia, P.A.
Category : Physician

Date: 07/13/2007

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

Re: CMS-1385-P
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Thank you for your consideration of this serious matter.

CMS-1385-P-2078

Submitter : Dr. gregory towne
Organization : Dr. gregory towne
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

GENERAL

GENERAL

see attachment

CMS-1385-P-2078-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

**Re: CMS-1385-P
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Thank you for your consideration of this serious matter.

Sincerely yours,

Gregory Towne MD

Submitter : Dr. Todd Delaney
Organization : Tejas Anesthesia, P.A.
Category : Physician

Date: 07/13/2007

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.

Submitter : Dr. Angela Camfield
Organization : Tejas Anesthesia, P.A.
Category : Physician

Date: 07/13/2007

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
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Thank you for your consideration of this serious matter.

Submitter : Dr. Frances Kasarda
Organization : West Jersey Anesthesia Associates
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

GENERAL

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Thank you for your consideration of this serious matter.

Frances Kasarda, MD

Resource-Based PE RVUs

Resource-Based PE RVUs

CMS-1385-P

Submitter : Dr. Brian McAlary
Organization : Rush University Medical Center
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

Payment For Procedures And Services Provided In ASCs

Payment For Procedures And Services Provided In ASCs

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
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Thank you for your consideration,
Brian McAlary, M.D.

Submitter : Dr. Paul Castillo

Date: 07/13/2007

Organization : Anesthesia Associates of New Mexico, P.C.

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-2083-Attach-1.DOC

July 12, 2007

Paul Castillo, MD.
Anesthesiologist
Anesthesia Associates of New Mexico, P.C.
1720 Louisiana Blvd NE, Suite 401
Albuquerque, NM 87110

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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Thank you for your consideration of this serious matter,

Paul Castillo, MD

Submitter : Dr. Cheryl Mordis
Organization : Dr. Cheryl Mordis
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

GENERAL

GENERAL

I support the increase in payment to physicians which is long overdue and may now approach cost of living increases. Thank you for addressing this complicated area of concern.

Submitter : Dr. George Coffey

Date: 07/13/2007

Organization : Anesthesia Associates of New Mexico, P.C.

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-2085-Attach-1.DOC

July 12, 2007

George Coffey, MD.
Anesthesiologist
Anesthesia Associates of New Mexico, P.C.
1720 Louisiana Blvd NE, Suite 401
Albuquerque, NM 87110

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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Thank you for your consideration of this serious matter,

George Coffey, MD

Submitter : Dr. Rolfe Williams

Date: 07/13/2007

Organization : American Society of Anesthesiologists

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

Re: CMS-1385-P
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Thank you for your consideration of this serious matter.

Rolfe M. Williams, M.D.

Submitter : Dr. William Dominguez
Organization : Anesthesia Associates of New Mexico, P.C.
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-2087-Attach-1.DOC

July 12, 2007

William Dominguez, MD.
Anesthesiologist
Anesthesia Associates of New Mexico, P.C.
1720 Louisiana Blvd NE, Suite 401
Albuquerque, NM 87110

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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Thank you for your consideration of this serious matter,

William Dominguez, MD

Submitter : Dr. David Larsen

Date: 07/13/2007

Organization : Dr. David Larsen

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

Re: CMS-1385-P

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Thank you for your consideration of this serious matter.

Submitter : Dr. Choudary Ganga
Organization : Anesthesia Associates of New Mexico
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

GENERAL

GENERAL

Sec Attachment

CMS-1385-P-2089-Attach-1.DOC

July 12, 2007

Choudary Ganga, MD.
Anesthesiologist
Anesthesia Associates of New Mexico, P.C.
1720 Louisiana Blvd NE, Suite 401
Albuquerque, NM 87110

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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Anesthesia Coding (Part of 5-Year Review)**

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Thank you for your consideration of this serious matter,

Choudary Ganga, MD

Submitter : Dr. Earl Godwin
Organization : Anesthesia Associates of New Mexico
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-2090-Attach-1.DOC

July 12, 2007

Earl Godwin, MD.
Anesthesiologist
Anesthesia Associates of New Mexico, P.C.
1720 Louisiana Blvd NE, Suite 401
Albuquerque, NM 87110

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
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Thank you for your consideration of this serious matter,

Earl Godwin, MD

Submitter : Dr. Brian Gronert

Date: 07/13/2007

Organization : Anesthesia Associates of New Mexico, P.C.

Category : Physician

Issue Areas/Comments

GENERAL

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See Attachment

CMS-1385-P-2091-Attach-1.DOC

July 12, 2007

Brian Gronert, MD.
Anesthesiologist
Anesthesia Associates of New Mexico, P.C.
1720 Louisiana Blvd NE, Suite 401
Albuquerque, NM 87110

Leslie V. Norwalk, Esq.
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Thank you for your consideration of this serious matter,

Brian Gronert, MD

Submitter : Dr. David Hartson

Date: 07/13/2007

Organization : Anesthesia Associates of New Mexico, P.C.

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-2092-Attach-1.DOC

#2092

July 12, 2007

David Hartson, MD.
Anesthesiologist
Anesthesia Associates of New Mexico, P.C.
1720 Louisiana Blvd NE, Suite 401
Albuquerque, NM 87110

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
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Thank you for your consideration of this serious matter,

David Hartson, MD

Submitter : Dr. Michael Haske

Date: 07/13/2007

Organization : Anesthesia Associates of New Mexico, P.C.

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-2093-Attach-1.DOC

July 12, 2007

Michael Haske, MD.
Anesthesiologist
Anesthesia Associates of New Mexico, P.C.
1720 Louisiana Blvd NE, Suite 401
Albuquerque, NM 87110

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)**

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,

Michael Haske, MD

Submitter : Dr. ARTHUR EWERS
Organization : CALIF. SOCIETY OF ANESTHESIOLOGISTS
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

GENERAL

GENERAL

SEE ATTACHED COMMENTS

CMS-1385-P-2094-Attach-1.RTF

Department of Health and Human Services
Centers for Medicare & Medicaid Services
Office of Strategic Operations & Regulatory Affairs

The attachment cited in this document is not included because of one of the following:

- The submitter made an error when attaching the document. (We note that the commenter must click the yellow "Attach File" button to forward the attachment.)
- The attachment was received but the document attached was improperly formatted or in provided in a format that we are unable to accept. (We are not are not able to receive attachments that have been prepared in excel or zip files).
- The document provided was a password-protected file and CMS was given read-only access.

Please direct any questions or comments regarding this attachment to
(800) 743-3951.

Submitter : Dr. Rick Hudson
Organization : Anesthesia Associates of New Mexico, P.C.
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-2095-Attach-1.DOC

July 12, 2007

Rick Hudson, MD.
Anesthesiologist
Anesthesia Associates of New Mexico, P.C.
1720 Louisiana Blvd NE, Suite 401
Albuquerque, NM 87110

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
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Thank you for your consideration of this serious matter,

Rick Hudson, MD

Submitter : Dr. Mark Kakumanu

Date: 07/13/2007

Organization : Anesthesia Associates of New Mexico, P.C.

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-2096-Attach-1.DOC

July 12, 2007

Mark Kakumanu, MD.
Anesthesiologist
Anesthesia Associates of New Mexico, P.C.
1720 Louisiana Blvd NE, Suite 401
Albuquerque, NM 87110

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
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Thank you for your consideration of this serious matter,

Mark Kakumanu, MD

Submitter :

Date: 07/13/2007

Organization :

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

see attachment

CMS-1385-P-2097-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

**Re: CMS-1385-P
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Thank you for your consideration of this serious matter.

Submitter : Dr. Mani Khoshyomn
Organization : Anesthesia Associates of New Mexico, P.C.
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-2098-Attach-1.DOC

July 12, 2007

Mani Khoshyomn, MD.
Anesthesiologist
Anesthesia Associates of New Mexico, P.C.
1720 Louisiana Blvd NE, Suite 401
Albuquerque, NM 87110

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
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Thank you for your consideration of this serious matter,

Mani Khoshyomn, MD

Submitter : Dr. Kathryn Glas

Date: 07/13/2007

Organization : Emory

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
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Thank you for your consideration of this serious matter.

Kathryn Glas, MD, FASE, MBA

Submitter : Dr. Brent Richardson
Organization : Virginia Mason Medical Center
Category : Physician

Date: 07/13/2007

Issue Areas/Comments

GENERAL

GENERAL

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
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Thank you for your consideration of this serious matter.

Sincerely,

Brent A. Richardson, M.D.