

Submitter : Dr. dimpal patel
Organization : american society of anesthesiologists
Category : Physician

Date: 07/16/2007

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. Hoang Tran
Organization : CA Anesthesia Associates
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

Payment For Procedures And Services Provided In ASCs

Payment For Procedures And Services Provided In ASCs

Leslie V. Norwalk, Esq.
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Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
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Hoang Tran, MD

Submitter : Dr. Charles Gehring

Date: 07/16/2007

Organization : ASA

Category : Physician

Issue Areas/Comments

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Acting Administrator
Centers for Medicare and Medicaid Services
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Charles J. Gehring MD

Submitter : Dr. Lee Fleisher
Organization : University of Pennsylvania School of Medicine
Category : Academic

Date: 07/16/2007

Issue Areas/Comments

GENERAL

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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.

Lee A. Fleisher, M.D.
Professor and Chair of Anesthesiology
University of Pennsylvania School of Medicine

Submitter : Dr. Charles Gehring
Organization : ASA
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

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Acting Administrator
Centers for Medicare and Medicaid Services
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Charles GehringMD

Submitter : Dr. Sapna Havildar Havildar

Date: 07/16/2007

Organization : United Anesthesia Services

Category : Physician

Issue Areas/Comments

GENERAL

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Acting Administrator
Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
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Baltimore, MD 21244-8018

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Thank you for your consideration of this serious matter.
Sapna Havildar M.D.

Submitter : Dr. susan wogan

Date: 07/16/2007

Organization : Anesthesia Services, P.A.

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

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

Re: CMS 1385-P

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To insure 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. Huafeng Wei
Organization : University of Pennsylvania
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

GENERAL

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Anesthesia Coding (Part of 5-Year Review)

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Thank you for your consideration of this serious matter.

Submitter : Carol Hamerski
Organization : Carol Hamerski
Category : Health Care Industry

Date: 07/16/2007

Issue Areas/Comments

GENERAL

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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. Patricia Michels
Organization : OHSU Anesthesia and Peri-operative medicine
Category : Physician

Date: 07/16/2007

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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I am currently a resident in anesthesiology and until now have been disappointed by the undervalued opinion of anesthesia care. In an era with increasing surgeries in patients 65 years and older it is imperative to provide expertly trained anesthesiologists to ensure appropriate and excellent care. I strongly encourage the increase recommended by the RUC and hope that CMS will provide this improvement.

Thank you for your consideration of this serious matter.

Sincerely,
Patricia E. Michels, MD

Submitter : Dr. J. Tanner
Organization : University of Pennsylvania
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

GENERAL

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Submitter : Dr. Sophia Lyubarskaya
Organization : Dr. Sophia Lyubarskaya
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

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Submitter : Dr. Richard Han
Organization : University of Michigan
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

Payment For Procedures And Services Provided In ASCs

Payment For Procedures And Services Provided In ASCs

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Acting Administrator
Centers for Medicare and Medicaid Services
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Submitter : Dr. George Alexander

Date: 07/16/2007

Organization : Dr. George Alexander

Category : Physician

Issue Areas/Comments

GENERAL

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See Attachment

CMS-1385-P-2619-Attach-1.DOC

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

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Submitter : Dr. Gregory Unruh
Organization : Dr. Gregory Unruh
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

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Acting Administrator
Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
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Submitter : Dr. Rodger Barnette
Organization : Temple University
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

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

Coding-- Additional Codes From 5-Year Review

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Acting Administrator
Centers for Medicare and Medicaid Services
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Submitter : Dr. Christian Koch
Organization : Christian Koch M.D., Inc.
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-2622-Attach-1.DOC

CMS-1385-P-2622-Attach-2.DOC

CMS-1385-P-2622-Attach-3.DOC

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
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Submitter : Dr. scott hopkins
Organization : Dr. scott hopkins
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

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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. Kara Barnett

Date: 07/16/2007

Organization : Hospital of the University of Pennsylvania

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

The speciality of anesthesiology has been undervalued for years and I hope that you seriously consider equalizing our speciality with the other medical specialities.

Submitter : Matt Offerdahl
Organization : Old Pueblo Anesthesia
Category : Physician

Date: 07/16/2007

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:

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Thank you for your consideration of this serious matter.

Sincerely,

Matthew R Offerdahl, MD

Submitter : Dr. William Strohmeyer, D.O.
Organization : Dr. William Strohmeyer, D.O.
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

GENERAL

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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.

William Strohmeyer, D.O.
6616 Springwood Ct.
Temple, TX 76502

Submitter : Dr. Charles Thompson

Date: 07/16/2007

Organization : American Society of Anesthesiology

Category : Physician

Issue Areas/Comments

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

Payment For Procedures And Services Provided In ASCs

Dear Ms. Norwalk,

I'm writing to express my strongest support for the increase in anesthesia payment under the 2008 physician fee schedule. If medicare wants the services of quality people serving the senior population it is imperative that reimbursement for this service is increased. Sincerely, Charles Thompson MD

Submitter : Dr. Bryan Pearson
Organization : Medical Center Anesthesiologists
Category : Physician

Date: 07/16/2007

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.

Submitter : Dr. Thomas Epperson
Organization : Virginia Commonwealth University Hospital
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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Thank you for your consideration of this serious matter.

Tom Epperson

Submitter : Dr. Ana Pappas
Organization : Loyola University Medical Center
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

GENERAL

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Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
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Submitter :

Date: 07/16/2007

Organization :

Category : Physician

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
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,

I. Michael Allahverdi, M.D.

Submitter : Dr. Scott Clark
Organization : Dr. Scott Clark
Category : Physician

Date: 07/16/2007

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
Baltimore, MD 21244-8018

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Thank you for your consideration of this serious matter.

Sincerely,
Scott Clark, M.D.

Submitter : Dr. Yan Li

Date: 07/16/2007

Organization : Dr. Yan Li

Category : Physician

Issue Areas/Comments

GENERAL

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

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Thank you for your consideration of this serious matter

Submitter : Dr. Francisco Alvarez-Gil
Organization : Biscayne Anesthesia Group
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

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Sincerely,
Dr. Francisco Alvarez-Gil
Medical Director
Bayside Ambulatory Center

Submitter : Dr. Michael Nee
Organization : West Penn Allegheny Health System
Category : Physician

Date: 07/16/2007

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,
Michael Nee

Michael Nee, M.D.
Department of Anesthesiology
The Western Pennsylvania Hospital
Temple University School of Medicine
4800 Friendship Avenue Suite 451
Pittsburgh PA 15224

Submitter : Dr. Mohammad Baten
Organization : First Coloney Anesthesia Associates
Category : Physician

Date: 07/16/2007

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
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Baltimore, MD 21244-8018

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Thank you for your consideration of this serious matter.

Submitter : Dr. William Connell
Organization : Anesthesia Services Medical Group
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

GENERAL

GENERAL

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
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P.O. Box 8018
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William Connell

Submitter :

Date: 07/16/2007

Organization :

Category : Individual

Issue Areas/Comments

GENERAL

GENERAL

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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.

Caleb Yen
1700 Elmhurst Avenue
Oklahoma City, OK 73120

Submitter : Dr. Christopher Nelson

Date: 07/16/2007

Organization : Dr. Christopher Nelson

Category : Physician

Issue Areas/Comments

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

Payment For Procedures And Services Provided In ASCs

I am writing to argue strongly in favor of the proposed increase in the anesthesia conversion factor.

I am an anesthesiologist in private practice and I can tell you that medicare grossly underpays me for what I do, by a factor of at least 66%. Medicare payments are well under a third of what I get from private insurance, and are so paltry that our group actually loses money on every medicare patient we take care of, when you take into account the anesthesia personnel costs associated with taking care of these patients. In addition, medicare patients, being generally older, also tend to be sicker and require more, not less care, than the corresponding younger population. So in effect when we take care of medicare patients we take care of older, sicker, more clinically challenging and difficult patients, all for less money. Not just a little less money, but so little that we lose money on each case. As you might imagine, this provides a negative incentive for treating these patients.

As a comparison, my surgical colleagues tell me that medicare pays them 80% to 100% of what they can expect from private insurance. Why are we as anesthesiologists penalized?

I am not a greedy doctor trying to 'rip off' the government. I am just a humble physician asking to get paid a fair amount for a fair job, just like my surgeon colleagues.

Thank you,
Christopher Nelson, MD

Submitter :

Date: 07/16/2007

Organization :

Category : Individual

Issue Areas/Comments

GENERAL

GENERAL

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
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Christopher Cameron Yen
1700 Elmhurst Avenue
Oklahoma City, OK 73120

Submitter : Dr. Gustin Bateman
Organization : OU Dept of Anesthesiology
Category : Health Care Provider/Association

Date: 07/16/2007

Issue Areas/Comments

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

Payment For Procedures And Services Provided In ASCs

This is a very important revision that isn't an additional payment, but instead one that is restoring the standard that is seen in all other medical specialties. This was originally taken away because of a misinterpretation. It is very important to keep programs going in a field that is currently in a severe manpower shortage, that will only get worse with the continued closing of programs unless mistakes like this get remedied. I appreciate your time and will be available for any questions or to provide any information needed. Thank you.

Gustin Bateman MD
OU Dept of Anesthesiology

Submitter : Dr. Per-Olof Jarnberg
Organization : Oregon Health & Science University
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

GENERAL

GENERAL

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
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Per-Olof Jarnberg, MD, PhD
Department of Anesthesiology
Oregon Health & Science University
Portland, OR 97239

Submitter : Dr. Sandra Wilcox
Organization : University of California, San Diego
Category : Physician

Date: 07/16/2007

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.

Sincerely,
Sandra L. Wilcox, M.D., MPH
Clinical Professor of Anesthesiology
University of California, San Diego

Submitter : Dr. david carp
Organization : beverly anesthesia associates
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

Anesthesia services are undervalued. If we only provided services to Medicare patients we would go out of business. We would make less than some experienced nurses. Why risk having the Medicare patients not having the expertise of a physician Anesthesiologist?
Thank you.

Submitter : Dr. Ian Schaja
Organization : Dr. Ian Schaja
Category : Physician

Date: 07/16/2007

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.

Sincerely,

Ian M. Schaja, D.O.

Submitter : Dr. Lance Wagner
Organization : UPB / Lutheran Medical Center
Category : Physician

Date: 07/16/2007

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:

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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. Steven Schmidt
Organization : STAR Anesthesia
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

GENERAL

GENERAL

Dear Ms. Norwalk,

I am writing to show my strong support for the increase in anesthesia payments for the 2008 physician fee schedule. I am enthused that CMS has recognized the undervaluation of anesthesia services and has taken some steps toward rectifying this complicated problem. In a capitalistic society such as ours, the disparity between the commercial "going rate" and government funded services has me concerned - not only personally but philosophically. One of my surgical colleagues made a comment to me last week which really struck a nerve. He stated that he was convinced that the government was "trying to get out of the health care industry" by lowering fees and / or not adjusting for inflation until the system completely collapsed - similar to the worker's comp. program (at least in my area). I personally doubt that this is true, but the consistent undervaluation of anesthesia services specifically left me with little in the way of a rebuttal.

In an effort to improve the situation, the RUC has recommended CMS increase the anesthesia conversion factor to offset a calculated 32% work undervaluation. I am grateful that the Agency accepted this recommendation in a proposed rule and I support the full implementation of the RUC's recommendation. I genuinely feel that this would improve service to many of the government funded patients. The healthcare access of these patients is of obvious importance and it is imperative that the CMS follow through with the proposal by immediately implementing the increase in the anesthesia conversion factor as recommended by the RUC.

Thank you for your time,

Steven W. Schmidt

Submitter : Dr. Christopher Felling
Organization : none
Category : Physician

Date: 07/16/2007

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

Dear Ms. Norwalk:

I am writing in regard to CMS-1385-P Anesthesia Coding and the proposed increase in the RBRVS. I stongly support this increase and thank you for your consideration. This would right the unintentional undervaluing of anesthesia services by the current RBRVS system.

Currently about 1/3 of anesthesia groups are subsidized by hospitals here in the USA. This is especially true in heavy medicare regions.It makes sense why some high proportion medicare areas are then underserved. Currently Medicare pays \$16.19 per unit with payment of four units per hour plus start up, but nothing for set up or cancelled cases. That is \$64.76 per hour. I'm sure you understand that one would be hard pressed to find a plumber or electrician that would work for that wage. This is a gross undervaluation compared to other specialties.

The RUC has recommended that CMS increase the conversion factor by almost \$4.00 which is still short of the calculated 32% undervaluation, but would go a long way in correcting this defecit and ensuring access for our seniors.

I am glad that the Agency has accepted RUC's recommendation in its pending rule and ask you to fully implement such rule.

Thank you!
Chris Felling

Submitter : Dr. Cari Meyer
Organization : University of Wisconsin
Category : Physician

Date: 07/16/2007

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
Baltimore, MD 21244-8018

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

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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. Alan Curle
Organization : University of Rochester
Category : Physician

Date: 07/16/2007

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)

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Thank you for your consideration of this serious matter.

Submitter :

Date: 07/16/2007

Organization :

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

Anesthesia Coding (Part of 5-Year Review)

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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.

I appreciate your time and thank you for your consideration of this serious matter. I hope you will support the proposal to increase anesthesia payments under the 2008 Physician Fee Schedule.

Brian Tzeng, MD

Submitter : Dr. Michael Capozza
Organization : Anesthesia Service Medical Group
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-2652-Attach-1.DOC

Submitter : Dr. Robin Woodland
Organization : Physicians Anesthesia Service
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

GENERAL

GENERAL

Leslie V. Norwalk, Esq. July 16, 2007
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.

Sincerely,

Robin Woodland, MD

Submitter : Dr. Eric Rosenberg
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/16/2007

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)

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Thank you for your consideration of this serious matter.

Eric J. Rosenberg MD
Media, Pennsylvania

Submitter : Dr. Amr Hosny
Organization : Dr. Amr Hosny
Category : Physician

Date: 07/16/2007

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

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Thank you for your consideration of this serious matter.

Submitter : Dr. Songsiri Chanvitayapongs

Date: 07/16/2007

Organization : Old Pueblo Anesthesia

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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Songsiri Chanvitayapongs, M.D.

Submitter : Dr. lata potturi

Date: 07/16/2007

Organization : asmg

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

I support increased reimbursement.

Submitter : Dr. Alan Ross
Organization : University of Iowa Healthcare
Category : Physician

Date: 07/16/2007

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. Jonathan Slonin
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/16/2007

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.

Sincerely,

Jonathan H. Slonin, M.D.

Submitter : Gabriel Reising, M.D.
Organization : Gabriel Reising, M.D.
Category : Physician

Date: 07/16/2007

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.

Submitter : Dr. Jeanne Manser

Date: 07/16/2007

Organization : Dr. Jeanne Manser

Category : Physician

Issue Areas/Comments

Payment For Procedures And Services Provided In ASCs

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Thank you for your consideration of this serious matter.

Submitter : Dr. Rakesh Shah
Organization : Potomac Hospital, Woodbridge, VA
Category : Physician

Date: 07/16/2007

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

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,

Rakesh Shah M.D.

Staff Anesthesiologist
Potomac Hospital
Woodbridge VA
22191

Submitter : Dr. Michael Taylor
Organization : Lone Peak Anesthesia, American Fork, Utah
Category : Physician

Date: 07/16/2007

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. The severely undervalued anesthesia reimbursement for Medicare/Medicaid has had a major negative impact on my practice and on the practices of my anesthesia partners here at American Fork Hospital in American Fork, Utah.

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. I also do a large number of pediatric dental patients, and the low Medicaid reimbursement for these procedures has made it impossible or highly impractical for us to serve this patient group.

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.

Sincerely,

Michael Taylor, MD
1692 North 2000 West
Provo, Utah 84604

Member of Lone Peak Anesthesia, American Fork, Utah

Submitter : Dr. tahir manzoor

Date: 07/16/2007

Organization : ASA

Category : Physician

Issue Areas/Comments

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

Payment For Procedures And Services Provided In ASCs

SEE ATTACHED

CMS-1385-P-2664-Attach-1.DOC

Submitter : Dr. Francis N. Hamilton
Organization : Group Health Permanente
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

GENERAL

GENERAL

Please see attachment

CMS-1385-P-2665-Attach-1.DOC

Submitter : Dr. Charles Plotkin
Organization : East Carolina Anesthesia Ass.
Category : Physician

Date: 07/16/2007

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.

Charles N. Plotkin, MD

Submitter : Dr. Mary Clemency
Organization : Dr. Mary Clemency
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

GENERAL

GENERAL

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.

Sincerely,
Mary V. Clemency, MD

Submitter : Dr. Max Kelz
Organization : University of Pennsylvania Dept. of Anesthesiology
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

GENERAL

GENERAL

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Thank you for your consideration of this serious matter.

Submitter : Dr. Richard Klementavicius
Organization : Richard Klementavicius, MD, PA
Category : Physician

Date: 07/16/2007

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
Baltimore, MD 21244-8018

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Thank you for your consideration of this serious matter.

Richard Klementavicius, MD
Richard Klementavicius, MD PA
617 Bay Cliffs Rd
Gulf Breeze, FL 32561
850-934-4107
klementa@yahoo.com

Submitter : Dr. Meghan Lane
Organization : University of Pennsylvania Health System
Category : Physician

Date: 07/16/2007

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.

Sincerely,

Meghan Lane, MD
Resident Physician
Department of Anesthesiology and Critical Care
University of Pennsylvania
Philadelphia, PA

Submitter : Dr. Eric Harris
Organization : University of Miami/Miller School of Medicine
Category : Physician

Date: 07/16/2007

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.

Submitter : Dr. Kenneth Sherban
Organization : Lynchburg Anesthesia Associates, Inc.
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

GENERAL

GENERAL

Dear Madam/Sir:

For too long Medicare has been grossly under reimbursing doctors for Anesthesia related patient care. Whereas most specialties can expect 120 to 140% of Medicare from private payors for close to reasonable payment, the private payors realize they must pay in excess of 300% of Medicare rates for anesthesiology services. This puts hospital with high Medicare populations at risk of having vanishing anesthesia coverage. With the aging population, the percentage of medicare patients increases in retirement areas and this makes recruiting anesthesia providers to these regions next to impossible. We do not believe that the US should do what Great Britain has done; i.e. be forced to recruit terrorist MDs from underdeveloped countries to provide healthcare for our senior citizens. Just as Great Britain has a two tier health care system with the affluent getting private healthcare care and the rest relying on the national health care service, the US has a two tier system: the first tier for those under 65 who have health insurance and the second tier for medicare patients. We are most thankful that CMS has realized that RBRVS has provided radical under payment for anesthesia care and the proposed increase will do much to ensure excellent care for our elderly. As an aging baby boomer I am interested in this bill not only as an MD Anesthesiologist, but also as one who will soon qualify for Medicare.

Thank you for your attention.

Respectfully submitted,

Kenneth A. Sherban, MD

Submitter : Dr. Douglas Hill
Organization : Dr. Douglas Hill
Category : Physician

Date: 07/16/2007

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-2673-Attach-1.DOC

CMS-1385-P-2673-Attach-2.DOC

Submitter : Dr. Eric Baurle

Date: 07/16/2007

Organization : Dr. Eric Baurle

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.

Eric Baurle, M.D.

Submitter : Dr. Babak Mahyar
Organization : UPMC
Category : Physician

Date: 07/16/2007

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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Anesthesia Coding (Part of 5-Year Review)

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Thank you for your consideration of this serious matter.

Submitter : Dr. Jasvir Sandhu
Organization : Anesthesiologist
Category : Physician

Date: 07/16/2007

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
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,
Jasvir S. Sandhu, M.D.

Submitter : Dr. paul garcia
Organization : Emory University
Category : Physician

Date: 07/16/2007

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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Submitter : Dr. Damon Dozier
Organization : Dr. Damon Dozier
Category : Physician

Date: 07/16/2007

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. Bradley Bowenschulte
Organization : St. John's Physicians and Clinics
Category : Critical Access Hospital

Date: 07/16/2007

Issue Areas/Comments

GENERAL

GENERAL

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.

Bradley A. Bowenschulte MD

Submitter : Dr. Scott Berliner

Date: 07/16/2007

Organization : Consultant Anesthesiologist Inc

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-2680-Attach-1.RTF

Submitter : Dr. Susan White
Organization : Susan White Anesthesia, Inc.
Category : Physician

Date: 07/16/2007

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.

Susan B. White, D.O.
8285 Sanctuary Drive
Mentor, OH 44040

Submitter : Dr. Karlyn Powell
Organization : Dr. Karlyn Powell
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

GENERAL

GENERAL

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

Re: CMS-1385-P

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Thank you for your consideration of this serious matter.

Submitter : Dr. Leo Contois
Organization : Dr. Leo Contois
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

GENERAL

GENERAL

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. Leonard Calodney

Date: 07/16/2007

Organization : C.R. Anesthesia

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-2684-Attach-1.DOC

Submitter : Dr. David Amar
Organization : Memorial Sloan-Kettering Cancer Center
Category : Physician

Date: 07/16/2007

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)

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Thank you for your consideration of this serious matter.

Submitter : Kevin Bucol
Organization : Kevin Bucol
Category : Physician

Date: 07/16/2007

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)

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Thank you for your consideration of this serious matter.

Submitter :

Date: 07/16/2007

Organization : Children's Hospital of Philadelphia

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

Anesthesia Coding (Part of 5-Year Review)

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Thank you for your consideration of this serious matter.

Submitter : Dr. Jim Birgenheier

Date: 07/16/2007

Organization : Dr. Jim Birgenheier

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-2688-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
Anesthesia Coding (Part of 5-Year Review)**

Dear Ms. Norwalk:

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I have worked through remarkable change in the last several years. Private practice models are not viable where seniors represent a substantial population. I have witnessed the breakup of three anesthesiology groups in three distinctly separate and different communities. Anesthesiologists are then sought for employment in subsidized situations. This shifts the loss taken to the employer, which is usually the hospital and results in an increase in the number of travelling physicians. In turn, hospitals are destabilized.

All of this shuffling causes an increase to the overall cost of care due to a variety of factors. Principally, the higher turnover of surgical teams leads to a loss of efficiency, standardization, and the inability to pursue sustained performance improvement efforts. Most concerning is the increase in risk to patient safety that is introduced when people work in unfamiliar environments. The RUC-based proposal gets to the root of this difficult problem.

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.

Sincerely,

James A Birgenheier, Jr., MD, DABA

Submitter : Dr. Jeff Kessel

Date: 07/16/2007

Organization : Anesthesiology Consultants of Virginia

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

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Thank you for your consideration of this serious matter.

Submitter : Dr. Stephen Bledsoe
Organization : Willamette Valley Medical Center
Category : Physician

Date: 07/16/2007

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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Thank you for your consideration of this serious matter.

Stephen W. Bledsoe, M.D., Ph.D.
Staff Anesthesiologist
Willamette Valley Medical Center
McMinnville, Oregon

Submitter : Dr. David Ciochetty
Organization : Anesthesia and Pain Specialists
Category : Physician

Date: 07/16/2007

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)

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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 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.

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Thank you for your consideration of this serious matter.

Submitter : Dr. Sheldon Regenbaum
Organization : Anesthesia and pain Medicine PA
Category : Physician

Date: 07/16/2007

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
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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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.

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Thank you for your consideration of this serious matter.

Submitter : Miss. Amy Schott
Organization : University of Iowa Hospitals Dept of Anesthesia
Category : Health Care Professional or Association

Date: 07/16/2007

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. Andrew A. Knight
Organization : Medical Anesthesia Consultants Medical Group, Inc.
Category : Physician

Date: 07/16/2007

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.

Andrew A. Knight, MD

Submitter : Dr. John Elinger

Date: 07/16/2007

Organization : Dr. John Elinger

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.

Submitter : Dr. Susan Dobbs Curling

Date: 07/16/2007

Organization : North Houston Anesthesiologists

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

I am in favor of the suggested increase in payment for anesthesia services. Susan Dobbs Curling, M.D. We want to continue to support the major hospitals.
Sdc

Submitter : Dr. Steve Solby

Date: 07/16/2007

Organization : Dr. Steve Solby

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.

Dr. Steve Solby
Mansfield, TX

Submitter : Dr. warren land

Date: 07/16/2007

Organization : Dr. warren land

Category : Physician

Issue Areas/Comments

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

Payment For Procedures And Services Provided In ASCs

/Users/warrenland/Desktop/070702-comment letter template.doc

Submitter : Dr. Christopher Burnett

Date: 07/16/2007

Organization : Dr. Christopher Burnett

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

Anesthesia Coding (Part of 5-Year Review)

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Thank you for your consideration of this serious matter.

Submitter : Dr. David Verzino
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/16/2007

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.

David Verzino, M.D.

Submitter : Dr. Gregory Malcolm
Organization : Critical Health Systems,S.C.
Category : Physician

Date: 07/16/2007

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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This disparity hits home as our Anesthesia group grapples with whether we continue to provide services in Camden,S.C. This area has a significantly higher Medicare population than the rest of our practice. We are currently discussing whether we will continue to provide our service to this rural community hospital because of the negative economics of the practice.

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.

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Thank you for your consideration of this serious matter.

Gregory R. Malcolm, M.D.
Columbia,S.C.

Submitter : Dr. Howard Larky
Organization : Dr. Howard Larky
Category : Physician

Date: 07/16/2007

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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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. Christopher Huser
Organization : Dr. Christopher Huser
Category : Physician

Date: 07/16/2007

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:

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Christopher J. Huser, M.D.

Submitter : Dr. Christopher McCarthy
Organization : Associated Anesthesiologists, S.C.
Category : Physician

Date: 07/16/2007

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Submitter : Ms. Sonya Lippold
Organization : Ms. Sonya Lippold
Category : Academic

Date: 07/16/2007

Issue Areas/Comments

Payment For Procedures And Services Provided In ASCs

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Submitter : Dr. Bradford Smith
Organization : MountainWest Anesthesia
Category : Physician

Date: 07/16/2007

Issue Areas/Comments

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Centers for Medicare and Medicaid Services
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Sincerely,

Bradford D. Smith M.D.
Dept. Anesthesiology, LDS Hospital SLC, UT