Submitter:

Dr. Candace Metcalf

Organization:

Dr. Candace Metcalf

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)

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 eare, 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.

Candace Metcalf, D.O.

Submitter:

Dr. Donald Martin

Organization:

American Society of Anesthesiologists

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
Re: CMS-1385-P

Ancsthesia Coding (Part of 5-Year Review)

Dear Ms. Norwalk:

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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 which occurred in part because: 1) anesthesia services remain 'time based' and so are difficult to compare directly with most other procedural services, and 2) The anesthesia services used as 'crosswalks', to compare with services in other specialties, happened to be some of the lowest values services provided by our specialty. Today, more than a decade since the RBRVS took effect, Medicare payment for anesthesia services stands at just \$16.19 per unit. This amount is currently less than 38% of the amount actually paid by the largest private payers in the state of Pennsylvania! Further, 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 medical care from specialist anesthesiologists, it is imperative that CMS approve the proposal in the Federal Register by fully and immediately implement the anesthesia conversion factor increase as recommended by the RUC.

Thank you for your consideration of this matter which is important in insuring access to surgical and anesthesia services for our nation's seniors.

Date: 07/25/2007

Submitter:

Dr. Jay Tendler, M.D.

Organization:

Dr. Jay Tendler, M.D.

Category:

Physician

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

I have been in practice for 25 years and have felt extremely frustrated that Anesthesiology is such a poorly compensated field by Medicare. My surgical colleagues have been able to care for Medicare patients and not feel financially burdened. This has not been the case for anesthesiologists. For years I have taken care of very ill patients who require the most skill and effort, for unreasonably low reimbursement rates.

This issue has been studied under many different methodologies which have consistently demonstrated that anesthesiology is relatively undervalued compared to other medical and surgical specialties. This needs to be corrected---the sooner, the better.

Jay Tendler, MD

Page 196 of 908 August 01 2007 11:33 AM

Submitter:

Dr. Donna Pearce

Organization: Columbia University- Harlem Hospital Center

DE 11

Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-4081-Attach-1.DOC

Page 197 of 908

August 01 2007 11:33 AM

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.

Submitter:

Dr. thomas ryan

Organization:

summit anesthesiology

Category:

Physician

Issue Areas/Comments

TRHCA-Section 108: CAP

TRHCA--Section 108: CAP

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Thank you for your consideration of this serious matter.

Sincerely,

Thomas J. Ryan, M.D.

Submitter:

Christopher Gharibo

Organization:

NYU Medical Center

Category:

Physician

Issue Areas/Comments

Ambulance Services

Ambulance Services
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

Ancsthcsia Coding (Part of 5-Year Review)

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Thank you for your eonsideration of this serious matter.

Submitter:

Dr. Herbert Luo

Date: 07/25/2007

Organization:

Associated Anesthesiologists, SC

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

Re: CMS-1385-P

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Thank you for your consideration of this serious matter.

Herbert Luo, MD

Submitter:

Dr. Oscar Zagala

-

Good Samaritan Hospital

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.

Thank you for your consideration of this serious matter.

Sincercly,

Dr. Oscar Zagala Ancsthesiologist

Submitter:

Dr. Daniel LaValley

Date: 07/25/2007

Organization:

Duke University Dept. of Anesthesiology

Category:

Physician

Issue Areas/Comments

Background

Background

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.

Submitter: Mrs. Freda Harper Date: 07/25/2007

Organization: Mrs. Freda Harper

Category: Individual

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.

Submitter:

Dr. Timothy Pastore

Organization:

Dr. Timothy Pastore

Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

I am an anosthesiologist in Pennsylvania. Our specialty has been exceptionally hard hit by the reductions in the anesthesia work rules and conversion factor by Medicare over the last 20 years. As of now, the Medicare conversion factor for anesth, services is less than 30% of all other third party payors. In Penna, this hits us even harder as we have a comparitively large elderly population. We are unable to recruit young anethesiologists as a result and thus we are faced with burning ourselves out or relocating to areas with younger populations. This is already occuring and eventually will result in great disruptions in access to care for the elderly. Please consider favorably the proposal to increase the anethesia conversion factor.

Sincerely, Timithy Pastore, MD

Submitter:

Mrs. Dora Halford

Organization:

Mrs. Dora Halford

Category:

Individual

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-4089-Attach-1.DOC

Page 205 of 908

August 01 2007 11:33 AM

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.

Submitter:

Date: 07/25/2007

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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Submitter:

Mr. James Rott

Organization:

Mr. James Rott

Category:

Other Health Care Professional

Issue Areas/Comments

Therapy Standards and Requirements

Therapy Standards and Requirements

As a Physical Therapist Assistant who has been adversely effected by the interpretation of regulation CFR484.4, I was dissapointed to see in the new preposed regulation that you have done nothing to change the regulation so that those of us who have qualified by equivelency to take and have passed the board exams in California are still techincally not eligible to provide services to Medicare patients. I have been licensed by the State of California for 17 years now and find it appaling that the proposed regulation for those who started their practice before Jan 1, 2008 reads the same as it did before. The statement in the regulation in part it for those starting their practice before Jan 1, 2008 that reads "except that these determinations of proficiency do not apply with respect to persons initially licensed by a state or seeking initial qualification as a physical therapist assistant after December 31, 1977" needs to be stricken so that the roughly 2000 of us who qualified by equivelency to take the boards in California and passed can continue to provide the high quality of care to Medicare patients like we were before. By not changing the regulation it is not only illegal to essentially de-license us but also is reducing the amount of providers available to treat Medicare patients and therefore reducing the quality of care available for these patients and increasing the cost of healthcare. It is also very frustrating to myself and everyone else effected to have worked hard to write everyone imaginable to try and change this illegal interpetation and to be told that the regulation was being re-written to see taxpayers money wasted on essentially nothing being done. I'm sure that if we all banded together and fought this the court system would agree and find in our favor. When did the federal government decide to control the licensing standards of the states? Please change this unfair and illegal interpretation of the regulation so that we can get back to providing the high quality of care to Medicare patient

Submitter:

Dennis Crane

Dennis Crane

Organization:
Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL Re: CMS-1385-P

Anesthesia Coding (Part of 5-Year Review)

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Thank you for your consideration of this serious matter.

Dennis Crane, DO Yakima, WA

Submitter:

Dr. Robert Whitcomb

Organization:

Elmhurst Anesthesiologists

Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

See attachment

CMS-1385-P-4094-Attach-1.DOC

CMS-1385-P-4094-Attach-2.DOC

CMS-1385-P-4094-Attach-3.DOC

Page 210 of 908

August 01 2007 11:33 AM

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:

Date: 07/26/2007

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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Page 211 of 908

Thank you for your consideration of this serious matter.

Regards, Christopher Collison, M.D.

Submitter:

Dr. Kevin Tarrant

Date: 07/26/2007

Organization:

Oregon anesthesiology group

Category:

Physician

Issue Areas/Comments

Coding-- Additional Codes From 5-Year Review

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Page 212 of 908

Submitter:

Dr. Matthew Hoopes

Organization:

Dr. Matthew Hoopes

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.

Thank you for your consideration of this serious matter. Thank you for speaking to us at the ASA Legislative Conference in May, I found it very informative and enjoyed your presentation.

Sincerely,

Matthew W. Hoopes, M.D.

Submitter:

Dr. Gregory Miller

Organization:

Physician Anesthesia Group

Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

see attachment

CMS-1385-P-4098-Attach-1.PDF

Page 214 of 908

August 01 2007 11:33 AM

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. Today, more than a decade since the RBRVS took effect, Medicare payment for anesthesia services stands at just \$16.19 per unit.

Medicare payment has not kept pace with our forms of reimbursement. The unit value is currently lower than it was 25 years ago. Because the dollar had considerably more purchasing power in 1982, this amounts to serious erosion in compensation.

Our anesthesia practice is typical of many groups. Medicare accounts for 40% of our time and effort, yet generates only 12% of our collections. I have yet to meet the person who would turn down giving up 12% of their pay in exchange for an additional 21 weeks of vacation. Medicare payments are reaching the point where "walking away", i.e. ceasing participation, will become less and less painful decision. The RUC recommendation to increase the anesthesia unit by almost \$4.00 increase will correct some of the undervaluation.

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,

Gregory Miller

Submitter:

Dr. Sean Dobson

Date: 07/26/2007

 ${\bf Organization:}$

Duke University Health System

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) Dear Ms. Norwalk: 1 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.

August 01 2007 11:33 AM

Page 215 of 908

Submitter:

Dr. Timothy Gilbert

Date: 07/26/2007

Organization:

University of Maryland School of Medicine

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.

Timothy B Gilbert, MD, MBA, MSc

Submitter:

Dr. Tim Adams

Organization:

Dr. Tim Adams

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. Eric Knorr

Organization:

Dr. Eric Knorr

Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

310 W Glenview Dr Salisbury, NC 28147 July 26, 2007

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.

Sincerely, Eric J. Knorr, MD Salisbury, NC

Submitter:

Dr. BARBARA LEIGHTON

Date: 07/26/2007

Organization:

WASHINGTON UNIVERSITY IN SAINT LOUIS

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

Rc: CMS-1385-P

Anesthesia Coding (Part of 5-Year Review)

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Thank you for your consideration of this serious matter.

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

Ancsthesia Coding (Part of 5-Year Review)

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Submitter:

Dr. Gregory Erb

Organization:

Midwest Anesthesia Assoc

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.

Gregory Erb, M.D.

Submitter:

Dr. Igor Kravchenko

Organization:

Dr. Igor Kravchenko

Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

Lcslie 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. Peter B. Sakas Sakas

Organization:

Dubuque 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

Re: CMS-1385-P

Ancsthesia Coding (Part of 5-Year Review)

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Thank you for your consideration of this serious matter.

Dr. Peter B. Sakas

Submitter:

Dr. Anthony Gigliobianco

Organization:

Northwest anesthesia and Pain

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. Billye Gosnell

Date: 07/26/2007

Organization:

Northwest Anesthesia and Pain

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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Submitter:

Dr. Naushaba Habib

Date: 07/26/2007

Organization:

NOrthwest Anesthesia and Pain

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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Submitter:

Mr. Marvin mason

Organization:

Mr. Marvin mason

Category:

Individual

Issue Areas/Comments

GENERAL

GENERAL

CMS-1385-P Support the proposal to increase anesthesia payments under the 2008 Physician Fee Schedule.

Page 227 of 908

August 01 2007 11:33 AM

Submitter:

Dr. Joseph Kuang

Date: 07/26/2007

Organization:

Northwest Anesthesia and Pain

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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Submitter:

Dr. Ramachan Lahori

Northwest Anesthesia and Pain

Organization: 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)

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Thank you for your consideration of this serious matter.

Date: 07/26/2007

Submitter:

Mrs. Deborah Mason

Organization:

Mrs. Deborah Mason

Category:

Individual

Issue Areas/Comments

GENERAL

GENERAL

CMS 1385P I support the proposal to increase anesthesia payments under the 2008 Physician Fee Schedule.

Page 230 of 908 August 01 2007 11:33 AM

Submitter:

Dr. KIng Lai

Date: 07/26/2007

Organization:

Northwest Anesthesia and Pain

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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Submitter:

Dr. Larry Lessard

Northwest Anesthesia and Pain

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.

Thank you for your consideration of this serious matter.

Submitter:

Dr. Joseph Liu

Organization:

Northwest Anesthesia and Pain

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)

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.

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Thank you for your consideration of this serious matter.

Submitter:

Dr. John Longwell

Organization:

Northwest Anesthesia and Pain

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)

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.

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Thank you for your consideration of this serious matter.

Page 234 of 908

August 01 2007 11:33 AM

Submitter:

Dr. Bing Lu

Date: 07/26/2007

Organization:

Northwest Anesthesia and Pain

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)

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.

Submitter:

Dr. Alexis Lynley

Date: 07/26/2007

Organization:

Northwest Anesthesia and Pain

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

Ancsthesia Coding (Part of 5-Year Review)

Dear Ms. Norwalk:

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Submitter:

Dr. Benjamin Deratzou

Organization:

Dr. Benjamin Deratzou

Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

see attachment

CMS-1385-P-4120-Attach-1.DOC

CMS-1385-P-4120-Attach-2.TXT

Page 237 of 908

August 01 2007 11:33 AM

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. Michelle McLellan

Organization:

Northwest Anesthesia and Pain

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. charles hearn

Organization:

Dr. charles hearn

Category:

Individual

Issue Areas/Comments

Impact

Impact

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. Leslie Milde

Organization:

Mayo 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

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.

Leslie Milde, M.D. Professor of Anesthesiology

Submitter:

Dr. David Berger

Organization:

Dr. David Berger

Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

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.

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Thank you for your consideration of this serious matter.

Submitter:

Dr. Thomas Scozzafava

Organization:

Dr. Thomas Scozzafava

Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

see attachment

CMS-1385-P-4125-Attach-1.DOC

Page 242 of 908

August 01 2007 11:33 AM

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.

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Submitter:

Dr.

Date: 07/26/2007

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

Anesthesia Coding (Part of 5-Year Review)

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Submitter:

Dr. Thomas Scozzafava

Organization:

Dr. Thomas Scozzafava

Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

see attachment

CMS-1385-P-4127-Attach-1.DOC

Page 244 of 908

August 01 2007 11:33 AM

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.

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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.

Submitter:

Dr. BobbieJean Sweitzer

Organization:

University of Chicago

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.

Thank you for your consideration of this serious matter.

BobbieJean Sweitzer, M.D.

Submitter:

Date: 07/26/2007

Organization:

Category:

Academic

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.

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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.

Samuel Clay

Submitter:

Dr. Martin Szafran

Organization:

University of Chicago

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)

Dear Ms. Norwalk:

I am writing to express my strongest support for the proposal to increase anesthesia payments under the 2008 Physician Fee Schedule. Along with my patients, 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 10 years 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 believe that the proposed increase of nearly \$4.00 per anesthesia unit 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. It will go a long way towards ensuring access to expert anesthesiology care in the future.

I urge CMS to 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.

M. Szafran, M.D.

Date: 07/26/2007

Submitter:

Dr. Wendy Binstock

American Society of Anesthesiologist

Organization:
Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

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.

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Thank you for your consideration of this serious matter.

Page 248 of 908 August 01 2007 11:33 AM

Submitter:

Mr. Kevin Paige

Date: 07/26/2007

 ${\bf Organization:}$

NA

Category:

Individual

Issue Areas/Comments

GENERAL

GENERAL

As an individual, I am happy to see the recommendations that medicare payments are being adjusted upwards to reflect adequate compensation for anesthesiologists - a move which is long overdue. In order to provide the best medical care to our elderly population, we need to attract and retain the best physicians. Higher compensation will continue to draw the most talented people to the medical field, promoting better care, greater discovery in research and better overall satisfaction for patients. As you know, anesthesiologists play an integral role in the care provided to our elderly, especially given the increased use of invasive procedures and surgeries to improve their health. I am encouraged to see my tax dollars at work in the correct manner, putting health care dollars in the hands of physicians who deliver the care.

Submitter:

Dr. Charles Collard

Organization:

Baylor College of Medicine

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

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.

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Thank you for your consideration of this serious matter.

Regards,

C. David Collard, MD
Professor & Vice Chair
Baylor College of Medicine
Department of Anesthesiology
Texas Heart Institute
6720 Bertner Avenue, Room 0520
MC1-226
Houston, TX 77030

Telephone: 832-355-2666 Fax: 832-355-6500

Submitter:

Dr. Saraswathy Shekar

Organization:

Dr. Saraswathy Shekar

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)

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.

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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.

Sara Shekar

Submitter:

Dr. Terrence Trentman

Organization:

Dr. Terrence Trentman

Category:

Physician

Issue Areas/Comments

GENERAL

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Acting Administrator
Centers for Medicare and Medicaid Services
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Submitter:

Dr. Craig Wagner

Date: 07/26/2007

Organization:

South Jersey Anesthesia and Pain Physicians PC

Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

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

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Submitter:

Dr. Loran Mounir Soliman

Organization:

Cleveland Clinic Ohio

Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

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Acting Administrator
Centers for Medicare and Medicaid Services
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Submitter:

Dr. James Berny

Date: 07/26/2007

Organization:

American Society of Anesthesiologists

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

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Dr. James Berny MD

Submitter :
Organization :

Dr. Eric Buehler

American Society of Anesthesiologists

Category:

Health Care Professional or Association

Issue Areas/Comments

GENERAL

GENERAL

commentlettertemplate-1.doc

Submitter: Mr. Pe

Mr. Peter Kearns CRNA

American Association of Nurse Anesthetists

Organization:
Category:

Nurse Practitioner

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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Peter Kearns CRNA

Submitter:

Mr. Joseph Giampietro CRNA

Organization:

American Association of Nurse Anesthetists

Category:

Nurse Practitioner

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.

Joseph Giampietro CRNA

Submitter:

Miss. Tracy Osborn

Date: 07/26/2007

Organization:

American Association of Nurse Anesthetists

Category:

Nurse Practitioner

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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Tracy Osborn CRNA

Submitter:

Mrs. Dawn Holloway

Date: 07/26/2007

Organization:

American Association of Nurse Anesthetists

Category:

Nurse Practitioner

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

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

Dawn Holloway CRNA

Submitter:

Dr. Chinubhai Patel

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

Leslic 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,

Chinubhai Patel, MD Preferred Anesthesia Consultants, P.C.

Submitter:

Dr. Seetharamaiah Atluri

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

Category:

Physician

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.

Sincerely,

Seetharamaiah Atluri, M.D.

Submitter:

Dr. Robert Davis

Date: 07/26/2007

Organization:

American Academy of Pediatric Dentists

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

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Dr. Robert Davis DMD

Submitter:

Dr. David Peng

Organization:

Dr. David Peng

Category:

Physician

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:

Dr. Robert Goldstrom

Organization:

Dr. Robert Goldstrom

Category:

Physician

Issue Areas/Comments

GENERAL

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Acting Administrator
Centers for Medicare and Medicaid Services
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Sincerely,

Robert Goldstrom, M.D.

Submitter:

Dr. Pardha Kanagala

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

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Sincerely,

Pardha Kanagala, M.D.

Submitter:
Organization:

Dr. zoya mehta

MACC

Category:

Physician

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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Page 267 of 908

Thank you for your consideration of this serious matter.

Zoya Mehta M.D.

August 01 2007 11:33 AM

Date: 07/26/2007

Submitter:

Dr. Terrence Zipfel

Organization:

American Society of Otolaryngology

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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Dr. Terrence Zipfel MD

Page 268 of 908 August 01 2007 11:33 AM

Submitter:

Dr. Venkateswara Kanubaddi

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

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

Ancsthesia 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.

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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.

Sincerely,

Venkateswara Kanubaddi, M.D.

Submitter:

Dr. D'Andrae Douse

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

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

Rc: CMS-1385-P

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Sincerely,

D'Andrae Douse, M.D.

Submitter:
Organization:

Dr. Gerald Snyder

Preferred Anesthesia Consultants, P.C.

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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Sincerely,

Gerald Snyder, M.D.

Submitter:

Dr. Kian Porter

Physician

Date: 07/26/2007

Organization: Category: Preferred Anesthesia Consultants, P.C.

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.

Sincerely,

Kian Porter, M.D.

Submitter:

Dr. James DeSimone

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

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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Page 273 of 908

Thank you for your consideration of this serious matter.

Sincerely,

James DeSimone, M.D.

Submitter:

Dr. Rao Gummadi

Organization:

Preferred Anesthesia Consultants, P.C.

Category:

Physician

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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Sincerely,

Rao Gummadi, M.D.

Submitter :
Organization :

Dr. Zoya Mehta

MACC

Category:

Physician

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.

ZOya Mehta

Submitter :

Dr. Louis Knoble

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

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.

Sincerely,

Louis Knoble, M.D.

Submitter:

Dr. Brian Jenkins

Preferred Anesthesia Consultants, P.C.

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

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Thank you for your consideration of this serious matter.

Sincerely,

Brian Jenkins, M.D.

Page 277 of 908

August 01 2007 11:33 AM

Submitter:

Dr. Joseph Yurkanin

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

Category: Issue Areas/Comments

Physician

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,

Joseph Yurkanin, M.D.

Submitter:

Dr. Michael Yurkanin

Preferred Anesthesia Consultants, P.C.

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

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Sincerely,

Michael Yurkanin, M.D.

Submitter:

Dr. Edward Tompa

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

Category:

Physician

Issue Areas/Comments

GENERAL

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Acting Administrator
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Sincerely,

Edward Tompa, M.D.

Submitter:

Dr. Ramabrahmam Gullapalli

Organization:

Preferred Anesthesia Consultants, P.C.

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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Sincerely,

Ramabrahmam Gullapalli, M.D.

Submitter:

Dr. Scott Davis

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

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Sincerely,

Scott Davis, M.D.

Submitter:

Dr. Venkatarao Vemula

Date: 07/26/2007

 ${\bf Organization:}$

Preferred Anesthesia Consultants, P.C.

Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

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Sincerely,

Venkatarao Vemula, M.D.

Submitter:

Dr. David Donaldson

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

Category:

Physician

Issue Areas/Comments

GENERAL

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Page 284 of 908

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Sincerely,

David Donaldson, M.D.

August 01 2007 11:33 AM

Submitter:

Dr. Ray Tople

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

Category:

Physician

Issue Areas/Comments

GENERAL

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Sincerely,

Ray Tople, M.D.

Submitter:

Mrs. Marilyn Bowes

Date: 07/26/2007

Organization:

N/A

Category:

Individual

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:

1 am writing to express my strongest support for the proposal to increase anesthesia payments under the 2008 Physician Fee Schedule. 1 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 RLIC's recommendation.

I'm sure that you're aware that Medicare patients are among the sickest, with the most co-morbidities, and are the most likely to need the very best of anesthesiologists. If we continue to limit reimbursement, will there be anyone at the ready when you or I need a qualified anesthesiologist to attend us for our own procedure? To ensure that 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.

Marilyn R. Bowes

Submitter:

Dr. Satya Tummala

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

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.

Sincerely,

Satya Tummala, M.D.

Submitter:

Dr. Alton Liu

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

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

Rc: CMS-1385-P

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Thank you for your consideration of this serious matter.

Sincerely,

Alton Liu, M.D.

Submitter:

Dr. Magdy Toma

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

Category:

Physician

Issue Areas/Comments

GENERAL.

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

Sincerely,

Magdy Toma, M.D.

Submitter:

daniel obrien

Organization: daniel obrien

Category:

Physician

Issue Areas/Comments

GENERAL

GENERAL

see attachment

Submitter:

Dr. James Alifimoff

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

Category:

Physician

Issue Areas/Comments

GENERAL

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Leslie V. Norwalk, Esq.
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Page 291 of 908

Thank you for your consideration of this serious matter.

Sincerely,

James Alifimoff, M.D.

August 01 2007 11:33 AM

Submitter:

Dr. Anthony Cheng

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

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
P.O. Box 8018
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Sincerely,

Anthony Cheng, M.D.

Submitter:

Dr. Michael Cozzi

Date: 07/26/2007

 ${\bf Organization:}$

Preferred Anesthesia Consultants, P.C.

Category:

Physician

Issue Areas/Comments

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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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Sincerely,

Michael Cozzi, M.D.

Submitter:

Dr. Gil Mendoza

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

Category:

Physician

Issue Areas/Comments

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Sincerely,

Gil Mendoza, M.D.

Submitter:

Dr. Garry Walker

Date: 07/26/2007

Organization:

Preferred Anesthesia Consultants, P.C.

Category:

Physician

Issue Areas/Comments

GENERAL

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Acting Administrator
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