

Submitter : Dr. ron flax
Organization : first colonies anesthesia associates
Category : Physician

Date: 07/09/2007

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

July 9, 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)

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.

Yours Truly,
ron flax

Submitter : Dr. Stuart Marcus
Organization : First Colonies Anesthesia
Category : Physician

Date: 07/09/2007

Issue Areas/Comments

Resource-Based PE RVUs

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July 9, 2007

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

Yours Truly,

Daniel Koontz
President and CEO

Submitter : Dr. Richard Ko

Date: 07/09/2007

Organization : FCAA

Category : Physician

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

Submitter : Dr. Lawrence Dill

Date: 07/09/2007

Organization : self

Category : Physician

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

The proposal to increase the anesthesia conversion factor by \$4.00 per unit is long over due. For a long time anesthesia services have been under valued by an average of 45% compared to other specialty services. This undervalue is contributing to the shortage of qualified aneshtesia providers in th US. Please support this measure.

Submitter : Dr. Domiciano Santos
Organization : ASA
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

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

Coding-- Additional Codes From 5-Year Review

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
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P.O. Box 8018
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Thank you for your consideration of this serious matter.

Submitter : Dr. Bryan Kirby
Organization : Dr. Bryan Kirby
Category : Physician

Date: 07/10/2007

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. Gilberto Carrero
Organization : Dr. Gilberto Carrero
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

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

Coding-- Additional Codes From 5-Year Review
See attachment

CMS-1385-P-57-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)**

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Thank you for your consideration of this serious matter.

Gilberto Carrero, MD

Submitter : Ms. Christina Lundquist

Date: 07/10/2007

Organization : Johns Hopkins Hospital

Category : Hospital

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-58-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)**

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Thank you for your consideration of this serious matter.

Sincerely,

Christina A. Lundquist, M.H.S.
Administrator, Department of Anesthesiology and Critical Care Medicine
Johns Hopkins Hospital

Submitter : Dr. Clavio Ascari
Organization : Dr. Clavio Ascari
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

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

Coding-- Additional Codes From 5-Year Review

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. Deborah Barron
Organization : Dr. Deborah Barron
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

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

Coding-- Additional Codes From 5-Year Review

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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. Rafael Cartagena
Organization : Dr. Rafael Cartagena
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

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

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Thank you for your consideration of this serious matter.

Submitter : Dr. Josef Grabmayer

Date: 07/10/2007

Organization : Anesthesia Associates

Category : Physician

Issue Areas/Comments

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

Coding-- Additional Codes From 5-Year Review
see attachment

CMS-1385-P-62-Attach-1.DOC

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

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

Submitter : Dr. Justin Wu
Organization : first colony anesthesia associates
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

Resource-Based PE RVUs

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July 9, 2007

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Thank you for your consideration of this serious matter.

Yours Truly,

Justin Wu, MD

Submitter : Dr. Stan Lei
Organization : Oregon Anesthesiology Group
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

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Leslie V. Norwalk, Esq.
Acting Administrator
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Submitter : Dr.
Organization : Dr.
Category : Physician

Date: 07/10/2007

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 : Dr. ASHRAF RAZZAK
Organization : PENNSYLVANIA SOCIETY OF ANESTHESIOLOGIST
Category : Media Industry

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

I support PSA effort to increase medicare payment for the anesthesia services

Submitter : Karen Posner

Date: 07/10/2007

Organization : Karen Posner

Category : Individual

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,

Karen Posner, PhD

Submitter : Dr. Timothy Brennan
Organization : Univ of Iowa Hospitals and Clinics
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

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Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
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P.O. Box 8018
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Thank you for your consideration of this serious matter.

Timothy J Brennan MD

Submitter : Dr. William Mauck
Organization : Dr. William Mauck
Category : Physician

Date: 07/10/2007

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.

Submitter : Dr. Gary Palman
Organization : Spectrum Anesthesiology
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

CMS proposal to increase the anesthesia conversion factor

CMS-1385-P-70-Attach-1.DOC

July 10, 2007

To Whom It May Concern,

Recently CMS has suggested the possibility of increasing the anesthesiology conversion factor which would increase payment for anesthesiology services. As you may know, and on several levels, the payments for anesthesiology services has been artificially low for several years. This certainly places anesthesiologists and the training of anesthesiologists at a disadvantage. I have been dedicated for 25 years to working towards increasing anesthesiology services to rural areas in the State of Maine. Appropriate funding for residency training and fair and appropriate payment for valuable services allow both training of young anesthesiologists but allows rural communities to recruit and retain well trained physicians. Please support the proposed increase in Medicare funding for anesthesiology services.

Gary E. Palman, D.O.

President, Maine Society of Anesthesiologists

Submitter : Dr. Minh Thai
Organization : Shands at the University of Florida
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

"See Attachment"

#71

DEPARTMENT OF HEALTH AND HUMAN SERVICES
CENTERS FOR MEDICARE AND MEDICAID SERVICES
OFFICE OF STRATEGIC OPERATIONS & REGULATORY AFFAIRS

Please note: We did not receive the attachment that was cited in this comment. We are not able to receive attachments that have been prepared in excel or zip files. Also, the commenter must click the yellow "Attach File" button to forward the attachment.

Please direct your questions or comments to 1 800 743-3951.

Submitter : Dr. Adam Wendling
Organization : America Society of Anesthesiologists
Category : Physician

Date: 07/10/2007

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. Bruce Kaufman
Organization : Dr. Bruce Kaufman
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

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Submitter : Dr. Jeffrey D. Shapiro
Organization : Georgia Perioperative Consultants
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

Beneficiary Signature

Beneficiary Signature
Jeffrey D. Shapiro, M.D.

Submitter : Dr. John McCreary

Date: 07/10/2007

Organization : OAG

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

As an anesthesiologist who cares for a large number of Medicare patients I STRONGLY support the increase in the conversion factor for our field. Our reimbursement has been considerably below our cost associated with providing care since I entered practice 4 years ago. Thank you for supporting this increase proposal.

John McCreary M.D.

CMS-1385-P

Submitter : Dr. Raymond Omerza
Organization : Traverse Anesthesia associates
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

I am writing in support of increasing reimbursement for Anesthesia services as proposed. Continued cuts have made reimbursement laughable, and the way to solve budget shortfalls is not by cutting payments to physicians. I have a lot of suggestions if you are interested. Thank You Raymond J. Omerza MD

Submitter : Dr. Shrikumar Dongre
Organization : PTA, Winston Salem,NC 27103
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

It is important to keep a decent and fair reimbursement to maintain quality anesthesia care by qualified physicians. Thanks

Submitter : Dr. Nikola Tcherven
Organization : OAG
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

CMS-1385-P

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.

N. Tcherven, MD, MS

Submitter : Dr. Eric Heyer
Organization : American Society of Anesthesiology
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

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Thank you for your consideration of this serious matter.

Submitter : Dr. John Bramhall

Date: 07/10/2007

Organization : Washington State Society of Anesthesiologists

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

I would like to record the very strong support from our organization to the proposed changes in Medicare re-reimbursements for anesthesia services. The proposed changes, supported by the deliberations of the RUC, will make a tremendous difference to those anesthesiologists caring for Medicare patients and will greatly help to decrease the unsustainable cost-shifting practiced by most hospitals taking care of Medicare patients.

CMS-1385-P-80-Attach-1.PDF

WASHINGTON STATE SOCIETY OF ANESTHESIOLOGISTS

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

Tuesday, July 10, 2007

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

Dear Ms. Norwalk:

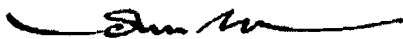
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Thank you for your consideration of this serious matter.



John Bramhall MD PhD
President
Washington State Society for Anesthesiologists

2150 N 107th Street (#205), Seattle, WA 98133

Submitter : Dr. Shlomo Elspas
Organization : self
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

I applaud your proposed increase for anesthesia services. Surgeons cut and sew, but it is the REAL doctor, the anesthesiologist, who runs your life support and keeps you alive for hours.

Payment For Procedures And Services Provided In ASCs

Payment For Procedures And Services Provided In ASCs

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TRHCA--Section 108: CAP

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I applaud your proposed increase for anesthesia services. Surgeons cut and sew, but it is the REAL doctor, the anesthesiologist, who runs your life support and keeps you alive for hours.

Submitter : Dr. Delbert Heskett
Organization : Pinnacle Anesthesia
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

As a physician, and a Medicare recipient, I recommend that physicians be adequately reimbursed so that other Medicare recipients and I may be able to find physicians who can afford to care for us.

Delbert L. Heskett, MD

Submitter : Dr. Peter Castro
Organization : Dr. Peter Castro
Category : Health Care Professional or Association

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

Please see attachment.

CMS-1385-P-83-Attach-1.RTF

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.

Peter L. Castro, M.D., M.B.A.

Submitter : Dr. Vlad Frenk
Organization : NAPA anesthesia
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

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Thank you for your consideration of this serious matter.

Submitter : Dr. George Mashour
Organization : University of Michigan
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

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

Submitter : Dr. MICHAEL LIPSON
Organization : American Society Of Anesthesiologists
Category : Physician

Date: 07/10/2007

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.

Submitter : Mr.
Organization : Mr.
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

How dare you raise physician payments! We are now in a health care crisis in this country and our budget is out of control. Please, do not use our tax dollars for this.

Submitter : Dr. Thomas Cooper

Date: 07/10/2007

Organization : FSA

Category : Physician

Issue Areas/Comments

GENERAL

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Re: CMS-1385-P

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Thank you for your consideration of this serious matter.

Submitter : Dr. David Burns
Organization : Penn State Hershey Medical Center
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
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David A. Burns M.D.
burnsda@upmc.edu

Submitter : Dr. Ron Kassof

Date: 07/10/2007

Organization : Schenectady Anesthesia Associates, PC

Category : Physician

Issue Areas/Comments

Resource-Based PE RVUs

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Ron T. Kassof, MD
Schenectady, NY

Submitter : Dr. Shaina Berkowitz
Organization : ASA
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

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

Sincerely,

Shaina Berkowitz, MD

Submitter : Mr. Habib Srour
Organization : ASA Student Section
Category : Health Care Professional or Association

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

Habib Srour
Medical Student
University of Toledo College of Medicine
Attention: CMS-1385-P
P.O. Box 8018
Baltimore, MD 21244-8018

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Sincerely,
Habib Srour

CMS-1385-P-92-Attach-1.DOC

Habib Srour
Medical Student
University of Toledo College of Medicine
Attention: CMS-1385-P
P.O. Box 8018
Baltimore, MD 21244-8018

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Sincerely,
Habib Srour

Submitter : Jeffrey Kirsch
Organization : Jeffrey Kirsch
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

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

This action is particularly important to help resuscitate the financial status of academic departments, which serve to train the new providers in our specialty.

Jeffrey R. Kirsch, MD
Professor and Chair
Department of Anesthesiology and Peri-Operative Medicine
Oregon Health and Science University

Submitter : Dr. john hsieh
Organization : Hoag Hospital
Category : Physician

Date: 07/10/2007

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. Ira Schwalb
Organization : Fidere Anesthesia Consultants
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

I support the increase in medicare payment to anesthesiologists. This is the most rapidly growing segment of our population comprising the sickest of patients. Their access to care will most certainly worsen without adequate compensation for health care providers.

Submitter : Dr. Robert Ellis
Organization : Dr. Robert Ellis
Category : Physician

Date: 07/10/2007

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.

Submitter : Dr. Ralph Beasley
Organization : American Society of Anesthesiology
Category : Physician

Date: 07/10/2007

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.

Submitter : Dr. Jay Srour
Organization : ASA
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

Jay Srour, M.D.
ASN
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,
Jay Srour, M.D.

CMS-1385-P-98-Attach-1.DOC

CMS-1385-P-98-Attach-2.DOC

Jay Srour, M.D.
ASN
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,
Jay Srour, M.D.

Submitter :

Date: 07/10/2007

Organization :

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
Baltimore, MD 21244-8018

Re: CMS-1385-P
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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. Michael Tobin
Organization : Dr. Michael Tobin
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

Regarding CMS-1385. Gentlemen: Please be advised that I support increased fees for delivery of anesthesia care. Current payment does not reimburse the true costs of the delivered care. Patients need to receive the best quality care possible, and in this competitive market adequate payment is necessary to meet that goal.

Submitter : Dr. Bill Feria
Organization : Dr. Bill Feria
Category : Physician

Date: 07/10/2007

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.

Submitter : Dr. manolo montes
Organization : St. Alexius Hospital
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

we deserve fair reimbursement

Submitter : Dr. Ryan Melcher

Date: 07/10/2007

Organization : Associated Anesthesiologists, PC, Des Moines, IA

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

Regarding CMS-1385-P, I fully support increasing the anesthesia conversion factor, the disparity has been too great for too long. Please correct this discrepancy now.

Submitter : Dr. Julia Stevenson
Organization : Loyola University Medical Center
Category : Physician

Date: 07/10/2007

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 : Dr. Maribel Gamoso
Organization : Dr. Maribel Gamoso
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

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 Lichtenstein
Organization : Advanced Anesthesia Specialists
Category : Physician

Date: 07/10/2007

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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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,

Alan Lichtenstein, M.D.
President, Advanced Anesthesia Specialists, PLLC

Submitter : Dr. Mark Comunale
Organization : Inland Empire Anesthesia Medical Group, Inc.
Category : Physician

Date: 07/10/2007

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.

Sincerely,

Mark E. Comunale, M.D.
Professor of Anesthesiology
Loma Linda University School of Medicine
Chairman, Department of Anesthesiology
Associate Medical Director
Arrowhead Regional Medical Center
Colton, CA 92324

Submitter :

Date: 07/10/2007

Organization :

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

CMS-1385-P

I am in complete agreement to increase Medicare/Medicaid payment to anesthesiologists. They serve a very important role in the care of surgical patients, and their responsibilities in this role carry considerable risks. The compensation for their services should reflect that importance and risk.

Submitter : Dr. Colin Mackenzie
Organization : American Soc Anesthesiologist
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

CMS-1385-P - Revisions to Payment Policies Under the Physician Fee Schedule, and Other Part B Payment Policies; Revisions to Payment Policies for Ambulance Services for CY 2008;

I support the long needed increase in Medicare Part B payments for provision of Anesthesia by physicians

Submitter : Dr. Scott Schartel
Organization : Temple University
Category : Physician

Date: 07/10/2007

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 appreciate the recognition by CMS of the undervaluing of anesthesia services in the current medicare fee schedule.

The RBRVS created a huge payment disparity for anesthesia care, mostly due to significant undervaluation of anesthesia work compared to other physician services. More than a decade since the RBRVS took effect, Medicare payment for anesthesia services stands at just \$16.19 per unit. This is below the cost of providing physician anesthesia services for our nation's elderly patients. The current medicare anesthesiology payment schedule makes caring for medicare patients economically unsustainable for anesthesiology practices.

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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I appreciate your consideration of this important matter.

Very truly yours,

Scott A. Schartel, DO
Professor & Associate Chair for Education
Department of Anesthesiology
Temple University
Philadelphia, PA

Submitter : Dr. Basem Abdelmalak
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/10/2007

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. Maggie Jeffries

Date: 07/10/2007

Organization : Dr. Maggie Jeffries

Category : Physician

Issue Areas/Comments

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Thank you for your consideration of this serious matter.

Submitter : Dr. Michael Hom

Date: 07/10/2007

Organization : Dr. Michael Hom

Category : Physician

Issue Areas/Comments

TRHCS—Section 101(b): PQRI

TRHCS--Section 101(b): PQRI

CMS 1385-P The proposed fee schedule increase for anesthesia should be accepted. Anesthesia fees have not seen a significant increase for awhile.

Submitter : Dr. Barry Smiler
Organization : Sarasota Memorial Hospital
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

Anesthesia reimbursement under Medicare has steadily decreased while practice expenses continue to rise. Medicare payments need to increase to keep pace with this situation

Submitter : Dr. Matthew Waldbusser
Organization : Valley Anesthesia Consultants
Category : Physician

Date: 07/10/2007

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: 07/10/2007

Organization :

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

CMS-1385-P - Revisions to Payment Policies Under the Physician Fee Schedule, and Other Part B Payment Policies; Revisions to Payment Policies for Ambulance Services for CY 2008;

Submitter : Dr. Frederick Rhodes
Organization : Dr. Frederick Rhodes
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

Leslie Norwalk, Esq.
Acting Administrator
CMMS
Attn: CMS-1385-P

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

Dear Ms. Norwalk:

I am writing to express my wholehearted support for the proposal to increase anesthesia payments under the 2008 Physician Fee Schedule. The significant undervaluation of anesthesia work compared to other physician services that occurred when the RBRVS was adopted has left us with a current rate of \$16.19 per unit. This amount is not sufficient to cover the costs involved in taking care of this important and increasing segment of our population. The RUC recommendation to offset the 32% work undervaluation factor and the resultant \$4.00 increase in the anesthesia unit rate will go a long way toward correcting this unfair undervaluation. Please fully and immediately implement this increase as recommended by the RUC.

Thank you for your help in this matter.

Frederick Rhodes, M.D.

Submitter : Dr. Tom Harrison
Organization : Dr. Tom Harrison
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

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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. Virgil Manica
Organization : Tufts-New England Medical Center
Category : Physician

Date: 07/10/2007

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,
Virgil Manica, M.D.
Anesthesiologist
Tufts-New England Medical Center
Department of Anesthesia
750 Washington Street
Boston, MA 02111

Submitter : Dr. Mark Sauer
Organization : Mark Alan Sauer, MD, PA
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

The \$3.30 increase in anesthesia reimbursements is necessary for our survival in business.

Submitter : Dr. Elizabeth Peyton
Organization : Hancock Anestheisa Group
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

Please pass legislation to increase anesthesia reimbursement for medicare. We receive a fraction of the amount paid to other physicians and facilities when caring for senior citizens. In fact, I had a plumber at my house recently that charged an hourly rate considerably greater than what I am compensated for caring for the elderly in the OR. These are often our sickest and most difficult patients to care for and I feel our efforts as anesthesiologists have been underappreciated.

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

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

This change is important to all anesthesiologists who feel they have been unfairly short-changed over the past years. This increase will help to redress the poor compensation for our expert services.

Submitter : Dr. Lawrence Rabinowitz
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

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

Sincerely,
Lawrence E. Rabinowitz, MD, MBA
Clinical Assistant Professor Cardiothoracic Anesthesiology
NYU School of Medicine

Submitter : Robert Engelhart

Date: 07/10/2007

Organization : Robert Engelhart

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

I support the proposed increase in Medicare physician payments for anesthesia providers.

Submitter : Dr. Guy Giroux
Organization : Anesthesia Services Medical Group of Topeka
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL
see attachment

Submitter : Dr. Roberto Lopez
Organization : Dr. Roberto Lopez
Category : Physician

Date: 07/10/2007

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 : Charles Cook
Organization : Charles Cook
Category : Physician

Date: 07/10/2007

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,
Charles Cook MD

Submitter : Dr. Steven Dobryman
Organization : Dr. Steven Dobryman
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

Anesthesia has been singled out by Medicare for reimbursement so far below that of most other specialists it seems capricious and malicious. By caring for the oldest and sickest patients we bill less than my plumber or HVAC technician. Where is the fairness? Without some action by CMS, the elderly will get some of the worst medical care as better physicians are migrating to positions where the Medicare (read elderly) population is low. Is this the goal?

Submitter : Dr. michelle brayton
Organization : newbern anesthesia associates
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

cms-1385-p With the high percentage of medicaid and medicare in Eastern North Carolina. There is still a shortage of anesthesia doctors. This will help to continue providing high quality medical care to the down east communities.

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

Date: 07/10/2007

Issue Areas/Comments

GENERAL

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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. Asokumar buvanendran
Organization : Rush University Medical Center
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

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

Submitter : Dr. Mark Miller
Organization : Dr. Mark Miller
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

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 : Dr. Warren Levy
Organization : Dr. Warren Levy
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

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

Sincerely,

Warren J. Levy, MD
Associate Professor of Anesthesiology and Critical Care
University of Pennsylvania School of Medicine

Submitter : Dr. Joshua Lumbley
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

As a resident physician, I would like to whole-heartedly support the Medicare program announcement on July 2 that it is considering an increase in payments for anesthesia. The increased demand of hospital-based care amongst the elderly population makes it crucial that there are anesthesiologists available and ready to care for such difficult patients. We are true perioperative specialists, offering pre-, intra-, and post-op care to patients in the preoperative clinic setting, operating room, emergency room, post anesthesia care unit, and ICUs of hospitals around the country. Our skills are invaluable to the hospital setting. Through our interventions and management, patient care is enhanced and quality of care improved. It is important to increase the anesthesia conversion factor to attract and retain skilled anesthesiologists to the field such that patient care is optimized and improved well into the 21st century. Thank you for your support.

Submitter : Dr. Craig Bonanni
Organization : Hartford Hospital
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

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Thank you for your consideration of this serious matter.

Submitter : Dr. Steven Croy
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/10/2007

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:

Steven Croy, MD
Highwood, IL. 60040
stevecroy@comcast.net

Submitter : Dr. anthony russell

Date: 07/10/2007

Organization : Dr. anthony russell

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

I believe anesthesia has been left behind in the past for fair considerations under the current Medicare fee schedule. This helps bring some parity in our fees with other specialties.

Submitter : Dr. Mark Pinosky
Organization : Dr. Mark Pinosky
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

I am in full support of this Docket: CMS-1385-P - Revisions to Payment Policies Under the Physician Fee Schedule, and Other Part B Payment Policies; Revisions to Payment Policies for Ambulance Services for CY 2008

Submitter : Dr. tobin finizio
Organization : kinston radiological associates
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

cms-1385-p need support to continue care for the downeastern nc patients. 80% medicare/medicaid in Duplin and Jones county. Please increase unit rates

Submitter : Dr. Carl Wilson
Organization : Dr. Carl Wilson
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

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Acting Administrator
Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
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Sincerely,

C Thayne Wilson MD

Submitter :

Date: 07/10/2007

Organization :

Category : Physician

Issue Areas/Comments

GENERAL

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

Submitter : Mohamed Ibrahim
Organization : Olympia Anesthesia Associate
Category : Physician

Date: 07/10/2007

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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Submitter : Dr. F.C Kumar (KFC)
Organization : American society of anesthesiologists
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

Thank you for considering increase in payments to Anesthesiologists per unit. This is a positive step towards working together. We need you and you need us.
Thank you!

Submitter : Dr. Jianlong Mu
Organization : Christiana care Health System, Newark, Delaware
Category : Physician

Date: 07/10/2007

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.

Submitter : Dr. Subash Reddy

Date: 07/10/2007

Organization : Fox Chase Anesthesiology Associates, P.C.

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

SEE ATTACHMENT

CMS-1385-P-145-Attach-1.DOC

Fox Chase Anesthesiology Associates
A Professional Corporation

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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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. 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,

Subash C. Reddy, M.D.

7500 Central Avenue Suite 208B
Philadelphia, PA 19111

Submitter : Dr. Paul Shakin
Organization : Dr. Paul Shakin
Category : Physician

Date: 07/10/2007

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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Submitter : Dr. Carl Sanchez
Organization : Dr. Carl Sanchez
Category : Congressional

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

Carl T Sanchez, MD
6336 Wasser Cove
Bartlett, TN, 38135

Leslie V. Norwalk, Esq.
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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.

Carl T Sanchez

Submitter : Dr. Allan Reed

Date: 07/10/2007

Organization : American Society of Anesthesiologists

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

Please support CMS - 1385 - P

Medicare payments for anesthesia services to physicians are so low that access to high quality anesthesiologists is limited. Consequently, medicare beneficiaries suffer. Please increase medicare payments to anesthesiologists.

Submitter : Dr. Michael Higgins
Organization : Vanderbilt University Medical Center
Category : Physician

Date: 07/10/2007

Issue Areas/Comments

GENERAL

GENERAL

I am writing to express my strong support for the proposal to increase anesthesia payments under the 2008 Physician Fee Schedule.

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. As you know, Medicare payment for anesthesia services stands at just \$16.19 per unit. This amount does not cover the cost of providing these services to the medicare patients which often are resource intensive relative to other patient populations.

At Vanderbilt we care for a much larger portion of medicare patients than other institutions in our community. Because of this higher proportion of medicare patients and the fact that they require higher staffing costs because of their medical co-morbidities, we are unable to have adequate financial resources to attract enough staff to open all of our operating rooms. This has negative consequences for all patients as access to necessary healthcare becomes limited and further increases costs associated with untreated medical conditions.

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. Thank you for your consideration.

Sincerely,

Michael Higgins, M.D. M.P.H.
Chair, Department of Anesthesiology
Vanderbilt University School of Medicine

Submitter : Dr. WILLIAM WALZ

Date: 07/10/2007

Organization : AMERICAN SOCIETY OF ANESTHESIOLOGISTS

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

PLEASE INCREASE THE ANESTHEISA MEDICARE CONVERSION FACTOR. IT IS IMPORTANT TO PAY PHYSICIANS A WAGE THAT INCREASES WITH INFLATION SO THAT WE MY CONTINUE TO PROVIDE EXCELLENT HEALTHCARE IN THE UNITED STATES.