

Submitter : Dr. Francis Kraemer
Organization : University of Pennsylvania Medical Center
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

Leslie V. Norwalk, Esq.

Acting Administrator

Centers for Medicare and Medicaid Services

Attention: CMS-1385-P

P.O. Box 8018

Baltimore, MD 21244-8018

Re: CMS-1385-P

Anesthesia Coding (Part of 5-Year Review)

Dear Ms. Norwalk:

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

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

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

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

Thank you for your consideration of this serious matter.

Sincerely,
F. Wickham Kraemer III, MD

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

Date: 07/11/2007

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

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

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Thank you for your consideration of this serious matter.

Paul M. Calkins Md

Submitter :

Date: 07/11/2007

Organization :

Category : Government

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 : Dr. James Sisamis

Date: 07/11/2007

Organization : American Society of Anesthesiologists

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

I am a practicing anesthesiologist in a 50-60 % medicade/care area and I feel that with the passing of cms-1385-p, I can stay in this community and continue to provide care in an underserve environment.

Submitter : Dr. Robin Seaberg
Organization : University of California San Diego
Category : Physician

Date: 07/11/2007

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 : Dr. David Clark

Date: 07/11/2007

Organization : University of Missouri: Columbia, Healthcare

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

The current and past reimbursement formula is antiquated and mal-advised. Please do make it equitable!

Submitter : Andrew Crook

Date: 07/11/2007

Organization : Andrew Crook

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

Please support this to correct an unfair payment for anesthesia service, which is grossly less than other specialities when compared (for example) to its fraction of private insurance payments.

Submitter : Mr. Amit Patel
Organization : Re: CMS-1385-P ASA
Category : Individual

Date: 07/11/2007

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 : Dr. Alan Smith
Organization : Greenville Anesthesiology, P.A.
Category : Individual

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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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.
Alan W. Smith, M.D.

Submitter : Dr. Keith Stevens
Organization : Anesthesia Assocaites of Charleston
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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Anesthesia Coding

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Thank you for your consideration of this serious matter.
C. Keith Stevens, MD
Charleston SC

Submitter : Dr. Patrick Ziemann-Gimmel
Organization : Dr. Patrick Ziemann-Gimmel
Category : Individual

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

It would be of great help to physicians like myself in underserved areas if those changes would be supported.

Sincerely

CMS-1385-P-861-Attach-1.DOC

#861

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

Patrick Ziemann-Gimmel, MD

Submitter : Dr. Eugene Moretti
Organization : Duke University Med.Ctr.Dept. of Anesthesiology
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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Thank you for your consideration of this serious matter.

Eugene W. Moretti M.D., MHSc.
Associate Professor of Anesthesiology
Department of Anesthesiology
Duke University Medical Center
Durham, NC 27710

Submitter : Dr. Bryan Wales
Organization : Olympia Anesthesia Associates
Category : Physician

Date: 07/11/2007

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.

Submitter : Chirag Jani

Date: 07/11/2007

Organization : Chirag Jani

Category : Physician

Issue Areas/Comments

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

Payment For Procedures And Services Provided In ASCs

A revision is needed to keep our specialty thriving.

Submitter : Dr. Mona Halim-armanios
Organization : Ohio state University medical center
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

As an anesthesiologist at highly ranked academic medical center for over 18 years as well as a member of the American society of anesthesiologist, I strongly support the proposed increases in anesthesia reimbursement in order to maintain adequate care for medicare patients. The proposed increases will allow us to continue to provide the highest and safest anesthesia monitoring intervention and care to this increasingly older and sicker population. Thank you very much for your consideration and approval.

Mona Halim-Armanios, M.D.

Submitter : Dr. Bradley Reid
Organization : UTMB - Galveston, TX
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Payment For Procedures And Services Provided In ASCs

Payment For Procedures And Services Provided In ASCs

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Acting Administrator
Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
P.O. Box 8018
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Thank you for your consideration of this serious matter.

Sincerely,

Bradley J. Reid, M.D.

Submitter : Dr. Jianguo Cheng

Date: 07/11/2007

Organization : Cleveland Clinic

Category : Physician

Issue Areas/Comments

GENERAL

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Acting Administrator
Centers for Medicare and Medicaid Services
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Submitter : nikhil thakkar
Organization : nikhil thakkar
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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Acting Administrator
Centers for Medicare and Medicaid Services
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Submitter : Dr. Chirag Jani

Date: 07/11/2007

Organization : Dr. Chirag Jani

Category : Physician

Issue Areas/Comments

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

Payment For Procedures And Services Provided In ASCs
see attachment

CMS-1385-P-869-Attach-1.DOC

Leslie V. Norwalk, Esq.
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Centers for Medicare and Medicaid Services
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Submitter : Dr. Vicente Farinas
Organization : Dr. Vicente Farinas
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

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Sincerely,

Vicente Farinas MD

Submitter : Mr. Terry Pace

Date: 07/11/2007

Organization : Azalea Orthopedics

Category : Health Care Professional or Association

Issue Areas/Comments

Impact

Impact

I manage the largest orthopedic practice in east Texas. Our area is very popular with retirees thus our patient mix is almost 50% Medicare. The MGMA national median is 25% while the 90th percentile is 39%. While the proposed 2008 reductions may not be significant to a practice with 25% Medicare, it will be a tremendous hit to our practice. In addition, it is already difficult to recruit orthopedists with this payer mix. What is going to happen when the baby-boomers begin retiring? Who is going to fix their broken hips and replace their knees? You have got to get rid of the SGR. We are already seeing access issues with respect to hip and knee revisions and if we can't recruit it will get significantly worse. Ultimately, my concern is that if we continue down this path we will find that our bright young people won't go into medicine. I'm at the end of the baby boomers and I am worried that finding quality physicians when I retire may be difficult.

Submitter : Dr. Steven Lagman

Date: 07/11/2007

Organization : Madison Anesthesiology Consultants LLP

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

CMS-1385-P

I am pleased to hear that CMS is considering a revision in payment to anesthesiologists. As you know, our specialty has been underpaid, relative to other provider groups for many years. I encourage you to continue with any plans to increase the anesthesiology conversion factor. Doing so will help maintain our enthusiasm for providing discounted services for our well-deserving older Americans. Even with an increase, please realize that we will still be providing services to Medicare patients at rates that are far below market, especially considering that patients in this population include (by virtue of coexisting illness) the most labor-intensive patients for whom we provide care. Nonetheless, a positive change will have a significant--perhaps practice-saving--impact on groups with high percentage of Medicare patients, and it will be much appreciated by all. Lastly, a positive change will send a clear message that CMS considers anesthesiologists to be important providers to Medicare patients. Thank you in advance for this act of fairness.

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

Date: 07/11/2007

Issue Areas/Comments

Payment For Procedures And Services Provided In ASCs

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Thank you for your consideration of this serious matter.

Brian Birmingham, MD

Submitter : Dr. Peter Nagi
Organization : University of Alabama at Birmingham
Category : Health Care Provider/Association

Date: 07/11/2007

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

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

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

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Thank you for your consideration of this serious matter.

Submitter : Dr. Scott Mantell

Date: 07/11/2007

Organization : AAPC

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

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Anesthesia Coding (Part of 5-Year Review)

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Submitter : Dr. Stuart Behrens
Organization : Dr. Stuart Behrens
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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Sincerely,

Stuart Behrens MD

Submitter : Dr. Andre Kwa
Organization : Dr. Andre Kwa
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Medicare Economic Index (MEI)

Medicare Economic Index (MEI)

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,
Andre Kwa M.D

Submitter : Dr. baiju sheth
Organization : metro health anesthesia
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

please increase anesthesia payments

Submitter : James Cooney

Date: 07/11/2007

Organization : James Cooney

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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Thank you for your consideration of this serious matter.

James Cooney

Submitter : Dr. David Grimes
Organization : University of Rochester
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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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.

Sincerely,
Dr David D Grimes
Department of Anesthesia
University of Rochester
Strong Memorial Hospital
Rochester, New York 14642

Submitter : Dr. Laurence Susser
Organization : New York University School of Medicine
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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

Date: 07/11/2007

Organization : Dr. Joel McMasters

Category : Physician

Issue Areas/Comments

Ambulance Services

Ambulance Services

The medical specialty of anesthesiology is the key specialty in all of American medicine. Hospitals and patients depend on these outstanding anesthesiologists to ensure safe, expert care. Recent decreases in payments to anesthesiologists are unwise and potentially decremental to American healthcare. Please increase payments to anesthesiologists immediately!

Submitter : Dr. Thomas Rymell

Date: 07/11/2007

Organization : Dr. Thomas Rymell

Category : Physician

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

Anesthesia needs these increases just to keep up with the cost of our employees. Our group is close to leaving the hospital we work at because it has too high of a medicare population and can not keep up with the cost of our employees to run anesthesia at a large referral center with a high medicare population. Thanks for your consideration. Thomas A. Rymell, M.D.

Submitter : Dr. Jevin Smith
Organization : UAMS
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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Acting Administrator
Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
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Submitter : Daniel Cole
Organization : Daniel Cole
Category : Individual

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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

Submitter : Dr. william mansfield
Organization : south oakland anesthesia associates
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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

William Mansfield, MD

Submitter : Dr. Donald Stogsdill, M.D.
Organization : Indiana Society of Anesthesiologists
Category : Physician

Date: 07/11/2007

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. Jennifer Gilbert
Organization : Hershey Medical Center
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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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.
Sincerely,
Jennifer Gilbert DO

Submitter : Dr. Scott Harper
Organization : Anesthesia Resources Management, Inc.
Category : Physician

Date: 07/11/2007

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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Baltimore, MD 21244-8018

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Submitter : Connie Weintraub
Organization : Connie Weintraub
Category : Individual

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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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. John Wills
Organization : University of New Mexico
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-891-Attach-1.DOC



THE UNIVERSITY OF NEW MEXICO • HEALTH SCIENCES CENTER

SCHOOL OF MEDICINE

#891

Department of Anesthesiology
and Critical Care Medicine

MSC11 6120

1 University of New Mexico

Albuquerque, New Mexico 87131-0001

Telephone (505)272-2610

FAX (505)272-1300

July 11, 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:

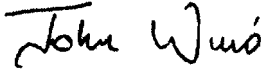
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Thank you for your consideration of this serious matter.

A handwritten signature in black ink that reads "John Wills". The signature is written in a cursive, slightly slanted style.

John Wills, MBBS FANZCA MBA
Professor and Chair
Department of Anesthesiology and CCM

Submitter : Dr. Douglas Mest

Date: 07/11/2007

Organization : Dr. Douglas Mest

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

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

Thank you for your consideration of this serious matter.

Submitter : Dr. billy ford

Date: 07/11/2007

Organization : Dr. billy ford

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

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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. Mickey Gierhart
Organization : Pinnacle Anesthesia Assoc.
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

I strongly support an increase in anesthesia reimbursement for medicare patients. This will allow us to continue to be able to care for these patients.

Submitter : Dr. Raymond Lupkas, Jr.
Organization : Raymond R Lupkas, Jr MDPA
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

see attachment

CMS-1385-P-895-Attach-1.PDF

#895

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.

Raymond Lupkas, MD
35 Braemar Rd.
Pinehurst, NC 28374
910-295-1343

Submitter : Dr. Gerard Bassell
Organization : Mid-Continent Anesthesiology, Chartered
Category : Physician

Date: 07/11/2007

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 an anesthesiologist in Wichita, Kansas and 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. Our anesthesiology group consists of nine anesthesiologists and 10 employed nurse anesthetists. We provide anesthesiology services to Medicare beneficiaries at an ambulatory surgery center in the city of Wichita.

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 order for our anesthesiology group to cover the costs of providing services to Medicare beneficiaries, it is necessary to use payments received from other payers. That means that it is only our ability to care for non-Medicare patients that allows us to provide services to Medicare beneficiaries. No anesthesiology practice could survive financially if it was limited to providing services to Medicare beneficiaries!

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.

Gerard M. Bassell, M.D.

Submitter : Kenneth Silverstein
Organization : Anesthesia Services, P.A.
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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.

Submitter : Dr. denise joffe
Organization : Dr. denise joffe
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

Leslie V. Norwalk, Esq.

Acting Administrator

Centers for Medicare and Medicaid Services

Attention: CMS-1385-P

P.O. Box 8018

Baltimore, MD 21244-8018

Re: CMS-1385-P

Anesthesia Coding (Part of 5-Year Review)

Dear Ms. Norwalk:

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

Thank you for your consideration of this serious matter.

Submitter : Miss. Elizabeth Peek
Organization : University of Oklahoma Dept. of Anesthesia
Category : Individual

Date: 07/11/2007

Issue Areas/Comments

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

Payment For Procedures And Services Provided In ASCs

I believe that the government should fully support the \$3.30 increase in payment of anesthesiologists working for Medicare. They are grossly underpaid for their services. Although taking care of are elderly is necessary, we need to take care of our doctors. They've spent many many years in school and have gone through much toil to acheive the career they love. Grossly underpaying them is another way of saying we don't value you your hard work and services. How can we properly take care of our elderly, if we don't take care of our doctors? They deserve the pay increase.

Submitter : Dr. Timothy Murray
Organization : Dr. Timothy Murray
Category : Physician

Date: 07/11/2007

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,

Timothy J. Murray, M.D.

Submitter : Dr. Steven Chang
Organization : Medical Anesthesia Consultants Medical Group Inc.
Category : Physician

Date: 07/11/2007

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 :

Date: 07/11/2007

Organization :

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

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

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

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

Thank you for your consideration of this serious matter.

Jeff Ceschi MD

Submitter : Dr. David Goodman
Organization : Dr. David Goodman
Category : Physician

Date: 07/11/2007

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,
David Goodman, MD
Washington, DC

Submitter : Dr. Monford Wolf
Organization : Southeast Anesthesiology Associates
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

Leslie Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid
Attention CMS-1385-P

Dear Ms. Norwalk,

I am writing to voice support for the proposed increase in valuation for anesthesia services currently being considered. Anesthesia services have been undervalued for several years now and with an increasing proportion of surgical patients being covered by medicare, this undervaluation is being increasingly felt by our specialty. Many groups are having to turn to alternative means (stipends, staffing shortages, etc) to remain financially solvent and competitive. Full implementation of the proposed increase would significantly help maintain the future viability of our specialty, which is crucial to maintaining and advancing the care of surgical patients.

Thank you for your consideration,
Monford Wolf, M.D.
2221 Vaughan Rd
Virginia Beach, VA 23457

Submitter : Dr. BRIAN BORMANN

Date: 07/11/2007

Organization : Dr. BRIAN BORMANN

Category : Physician

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

I am in favor of the increase.

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

Date: 07/11/2007

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.

Robert A. Ponte, M.D.

Submitter : Dr. Louis Levin

Date: 07/11/2007

Organization : Dr. Louis Levin

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.

Submitter : Dr. Robert Andrews
Organization : Parkway Anesthesiology
Category : Physician

Date: 07/11/2007

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.

Sincerely,
Robert A Andrews, M.D.

Submitter : Dr. Gary Mullen
Organization : Harvard Medical School
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

This comment is in regarding CMS reimbursement for anesthesia services. It is imperative that we revise the "2-case rule" at teaching institutions, and raise the reimbursement to a more reasonable level. Excellent care that is provided at these institutions goes unfunded to the point that nearly all anesthesia practices at academic medical centers operate at a loss because of the number of CMS patients they provide care for (the best care available).

What is the natural incentive? It is clear that providers will migrate to the private sector, thus further increasing the gap that exists in coverage for the 40 million americans that lack coverage, because as more providers move to the private payer hospitals (and ASC environment), more "skimming" will have to occur as the PRIVATE patients are filtered away from the hospital-based practices. The downward spiral of an increasing percentage of hospital CMS patients, and reduced CMS reimbursement will ensue and again weaken the system.

OUR CONGRESS has the responsibility to offer fair and reasonable payments to the hospitals providing these services, especially since the numbers will continue to increase. What business can operate indefinitely at such a loss?

If there's ever a question that physician services are over-paid, and the drug/equipment manufacturing companies are underpaid, entertain the following questions:

- 1) and operating room table is \$50,000 (more than my internship salary--after 21 years of education)
- 2) Zofran tablets--generic--(a common nausea medication) is \$12 PER TABLET (that's \$72/day). Who could afford such a medication? Not even me, and I've been a practicing physician for 9 years.

Very Respectfully Submitted,
Gary John Mullen, MD
18 VFW Parkway
Boston, MA 02131
850-261-4322

Submitter : Dr. Anne Lynn

Date: 07/11/2007

Organization : Children's Hospital/ University of Washington

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

As a pediatric subspecialist, my interest in CMS changing the reimbursement for anesthesiologist services may seem unusual. However, it is clear that the original fee structure undervalued anesthesiologist services, and this inequity has grown over time. It is gratifying that RMS has addressed this issue and suggested an increase that will help correct this undervaluation of anesthesia services. America's seniors and its pediatric patients deserve to access expert anesthesiologist services and this increase in fee structure will help make such care more widely available. Thank you for allowing me to comment.

Submitter : Dr. carlos gracia
Organization : Dr. carlos gracia
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

i am in favor of the increase in anesthesia reimbursements.

Submitter : Mr. Adam Snavelly
Organization : Mr. Adam Snavelly
Category : Individual

Date: 07/11/2007

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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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.

Best wishes for you and yours,
Adam Snavelly

Submitter : Dr. Meredith Brooks
Organization : BWH Hospital
Category : Physician

Date: 07/11/2007

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.

Dr. Meredith Brooks

Submitter :

Date: 07/11/2007

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)

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.

Ann Mrozowski, MBA
Director, Department of Anesthesiology
Allegheny General Hospital
Pittsburgh, PA 15212

Submitter : Dr. Shital Patel
Organization : Hanover Anesthesia Group
Category : Physician

Date: 07/11/2007

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.

Shital Patel, MD

Submitter : Dr. Michael Umanoff

Date: 07/11/2007

Organization : NJSSA and ASA

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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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. Again this is long overdue!

Thank you for your consideration of this serious matter.

Sincerely,

Michael Umanoff MD CMS-1385-P

Submitter : Dr. Mario Conol
Organization : Dr. Mario Conol
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-917-Attach-1.DOC

917

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,

Mario Conol, MD
Member, American Society of Anesthesiologists
Board Certified, American Board of Anesthesiology

Submitter : Dr. Anthony Chang
Organization : Dr. Anthony Chang
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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

Submitter : Dr. William Owens
Organization : Washington University School of Medicine
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

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

Coding-- Additional Codes From 5-Year Review

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

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

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Thank you for your consideration of this serious matter.

William D. Owens, M.D.

Submitter : Dr. Ammar Divan
Organization : St. Vincent's Hospital - Manhattan
Category : Physician

Date: 07/11/2007

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 : Ms. Silva Tirana
Organization : Suburban Hospital
Category : Nurse

Date: 07/11/2007

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

see attached

CMS-1385-P-921-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.

Silva Tirana, R.N.

Submitter : Dr. Eduardo Moreno
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/11/2007

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.

Eduardo E. Moreno, M.D.
University of Texas Medical Branch
Department of Anesthesiology

Submitter : Dr. Melissa Ennen
Organization : Stanford University
Category : Physician

Date: 07/11/2007

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.

Melissa Ennen, MD

Submitter : Dr. Patrick Segeleon
Organization : Emory University
Category : Physician

Date: 07/11/2007

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. Scott Springman
Organization : University of Wisconsin Medical School
Category : Physician

Date: 07/11/2007

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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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 important matter.

Scott Springman, MD
Professor of Anesthesiology
University of Wisconsin Medical School
Madison, Wisconsin
608-263-8100

Submitter : Dr. Frederick Bunke
Organization : Hartford Anesthesiology Associates
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

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

Coding-- Additional Codes From 5-Year Review

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

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Thank you for your consideration of this serious matter.

Submitter : Dr. Steve Starling
Organization : Anesthesia Resources Management
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

Attention: CMS-1385-P

P.O. Box 8018

Baltimore, MD 21244-8018

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

Submitter : Dr. Daniel Levinthal
Organization : Adventist Health Systems
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

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

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Thank you for your consideration of this serious matter.

Daniel J. Levinthal, M.D.

Submitter : Dr. David Beebe
Organization : University of Minnesota Medical School
Category : Physician

Date: 07/11/2007

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. stephen shuput

Date: 07/11/2007

Organization : Dr. stephen shuput

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

Regarding CMS proposal 1385-P:

I am writing to support the payment increase for Anesthesia in the 2008 physician fee schedule. The payment disparity caused by the RBRVS system is causing Anesthesiologists to avoid areas where the concentration of senior citizens is high. I am grateful that this problem is being addressed before the access to care for seniors is a more serious problem. If the situation gets worse, recruitment of new talent into the field of Anesthesiology would become difficult.

The RUC has recommended a nearly \$4.00 per anesthesia unit increase and I fully support this.

Respectfully, Stephen R Shuput MD

Submitter : Dr. Joyal Degani
Organization : Adventist Health Systems
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

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

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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.

Joyal Degani, M.D.

Submitter : Dr. Patricia Perry
Organization : Rush University Medical Center
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Payment For Procedures And Services Provided In ASCs

Payment For Procedures And Services Provided In ASCs

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

Re: CMS-1385-P
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.

Sincerely yours, Patricia Perry, M.D.

Submitter : Dr. Richard Shapiro
Organization : Union Memorial Hospital
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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

Submitter : Dr. Jaime Ronderos

Date: 07/11/2007

Organization : Dr. Jaime Ronderos

Category : Physician

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

Re: CMS-1385-P

Anesthesia Coding

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.

Sincerely,

Jaime R. Ronderos, MD

Submitter : Dr. Creston Martin
Organization : Dr. Creston Martin
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Payment For Procedures And Services Provided In ASCs

Payment For Procedures And Services Provided In ASCs

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

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

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Thank you for your consideration of this serious matter.

Sincerely,

Creston Martin, M.D.

Submitter : Dr. Thao Tran

Date: 07/11/2007

Organization : Allenmore 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.

Thao D. Tran D.O.
Allenmore Anesthesia Assoc.
Tacoma, WA

Submitter : Dr. Steve Gerschultz

Date: 07/11/2007

Organization : None

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

Please see attachment.

CMS-1385-P-937-Attach-1.DOC

#937

Steve Gerschultz
3602 Courtside Circle
Huntington Beach, CA 92649
July 11, 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 undervaluation of anesthesia services and is taking steps to address this issue.

Medicare reimbursement for anesthesia services has been significantly undervalued for some time. At this point it is less than half of our discounted HMO rates. My colleagues and I have again recently researched the opt out possibilities regarding Medicare. Of course this action would only hurt the mostly senior Medicare population and lead to other difficulties among all parties involved. Fortunately, dialogue, factual explanations, and reasonable solutions have prevailed.

I urge your support of the re-evaluation of anesthesia services. I feel a potential quandary can be averted with the long term benefit of the Medicare patient and their families.

Thank you for your time.

Sincerely,

Steve Gerschultz

Submitter : Dr. Mahmood Siddique

Date: 07/11/2007

Organization : Fox Chase Anesthesiology Associates, P.C.

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

SEE ATTACHMENT

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. Robert Hodson
Organization : ARM
Category : Health Care Provider/Association

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

Attention: CMS-1385-P

P.O. Box 8018

Baltimore, MD 21244-8018

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

Dear Ms. Norwalk:

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

Thank you for your consideration of this serious matter.

Robert Hodson, MD

Submitter : Dr. Alexander Rodarte

Date: 07/11/2007

Organization : None

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

See attachment

CMS-1385-P-940-Attach-1.DOC

CMS-1385-P-940-Attach-2.DOC

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

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

Dear Ms. Norwalk:

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.

Since I am a strong proponent of a single payer system, the Medicare model must be functional in order to continue to gain support for this solution to the inequality of our health care delivery system. If we physicians are not able to provide services at a reasonable compensation, then the system will never work. While congress debates the various solutions to this situation, you must act to preserve a system that has proven over the years to be excellent at delivering quality care to our senior citizens.

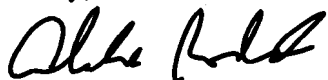
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To ensure that our patients have access to expert anesthesiology medical care, it is imperative that CMS follow through with the proposal in the Federal Register by fully and immediately implementing the anesthesia conversion factor increase as recommended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

Thank you for your consideration of this serious matter.

Sincerely,



Alexander Rodarte, M.D., FCCM

Submitter : Dr. Jason Mitchell

Date: 07/11/2007

Organization : Dr. Jason Mitchell

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.
Jason Mitchell, M.D.

Submitter : Dr. Richard Beers
Organization : SUNY Upstate Medical University
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

Please see attached MS Word document

CMS-1385-P-942-Attach-1.DOC

#942

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 important issue.

When the RBRVS was instituted, anesthesia work was significantly undervalued compared to other physician services. Medicare payment for anesthesia services is less today by absolute dollar comparison than it was in 1990. In the teaching hospital in which I practice, this payment covers a little over half the cost of providing the care for our area's senior citizens. This is a tragedy, as it creates 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. This would be a major step towards 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.

This is, indeed, a very serious matter.

Sincerely,

Richard A. Beers, MD

Submitter : Dr. Joseph Jaros
Organization : Anesthesia Specialists of Albuquerque
Category : Physician

Date: 07/11/2007

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.

Joseph A Jaros, MD

Submitter : Dr. Phillip Carroll
Organization : Fox Chase Anesthesiology Associates, P.C.
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

SEE ATTACHMENT

Submitter : Dr. Basil Karayannis
Organization : Fox Chase Anesthesiology Associates
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

see attachments

Submitter : Dr. Jeffrey Anderegg

Date: 07/11/2007

Organization : Dr. Jeffrey Anderegg

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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I work in a small community in Northwest Wisconsin. 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.

Respectfully yours,

Jeffrey J Anderegg MD

Submitter : Dr. Todd Patton
Organization : Williams and Wagner
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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

Todd Patton M.D.

Submitter : Dr. Richard Stilz
Organization : Anesthesia Associates of Cincinnati
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

See attachment. Medicare payments for physician services in Anesthesiology have been absolutely inadequate for many years now, really since the RBRVS system was adopted. The original methodology for assigning fees in Anesthesiology was flawed, a fact acknowledged by the author of the study. It is long past time to rectify this situation. Failure to do so may well result in the inability of Medicare patients to obtain care. Since I will be one of those patients before too long, I hope you correct this quickly. Richard Stilz, M.D.

Submitter : Dr. James Rockefeller
Organization : Anesthesia Specialists of Albuquerque
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

I am in favor of increased reimbursement under CMS 1385 P.

Submitter : Dr. Myra Stamps
Organization : Dr. Myra Stamps
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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