

Submitter : Dr. Shari Lurie

Date: 07/12/2007

Organization : Dr. Shari Lurie

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

RE: CMS-1385

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 physicians. Today, more than a decade since the RBRVS took effect, Medicare payment for anesthesia services are a mere \$16.19 a 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 from areas with disproportionately high Medicare populations.

In an effort to rectify this unetenable situation, the RUC recommended that CMS increase the anesthesia conversion factor to offset a calculated 32 percent work undervaluation- this would result in an increase of nearly \$4.00 a 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 change, and I support full implementation of the RUC's recommendations.

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 to increase as recommended by the RUC.

Thank you for your consideration in this very serious matter that will effect all or the nation's senior citizens.

Shari Lurie, MD

Submitter : Dr. Barbara Gasior
Organization : Dr. Barbara Gasior
Category : Physician

Date: 07/12/2007

Issue Areas/Comments

GENERAL

GENERAL

Regarding Physician Reimbursement Policies: They should not be decreased!

Submitter : Sharon Bratcher
Organization : Sharon Bratcher
Category : Nurse

Date: 07/12/2007

Issue Areas/Comments

GENERAL

GENERAL

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. 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 in this serious matter.

Submitter : Dr. Paul Colavincenzo
Organization : Kettering Anesthesia Associates, Inc
Category : Physician

Date: 07/12/2007

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.

Paul Colavincenzo, M.D.
Kettering Anesthesia Associates, Inc.

Submitter : Dr. Frank Bemis
Organization : Anesthesia Resources Management
Category : Physician

Date: 07/12/2007

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.

Sincerely,

Frank Bemis, M.D.
205 873-1553

Submitter : Dr. Gustavo Collins
Organization : Kettering Anesthesia Associates, Inc
Category : Physician

Date: 07/12/2007

Issue Areas/Comments

GENERAL

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

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

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Thank you for your consideration of this serious matter.

Gustavo Collins, M.D.
Kettering Anesthesia Associates, Inc

Submitter : Dr. Jeremy Katz
Organization : Dr. Jeremy Katz
Category : Congressional

Date: 07/12/2007

Issue Areas/Comments

GENERAL

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

Re: CMS-1385-P

Anesthesia Coding (Part of 5-Year Review)

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Thank you for your consideration of this serious matter.

Sincerely,
Jeremy Katz MD

Submitter : Dr. Scott Kercheville
Organization : UTHSCSA--Dept. of Anesthesiology
Category : Physician

Date: 07/12/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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

Dear Ms. Norwalk:

As a practicing anesthesiologist for the past 21 years, 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.

I began practice in 1986 and under the old MAC (Maximal allowable charge) I was allowed to charge \$32 per "point" (anesthesia billing units). 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. This equated to an immediate greater than 60% reduction in my charges.

Today, more than a decade since the RBRVS took effect, Medicare payment for anesthesia services stands at just \$16.19 per unit. This amount does not cover the cost of caring for our nation's seniors, and is creating an unsustainable system in which anesthesiologists are being forced away from areas with disproportionately high Medicare populations.

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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,

Scott E. Kercheville, M.D.

Submitter : Dr. Mark Crawford
Organization : Kettering Anesthesia Associates, Inc
Category : Physician

Date: 07/12/2007

Issue Areas/Comments

GENERAL

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

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

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

Thank you for your consideration of this serious matter.

Mark Crawford, M.D.
Kettering Anesthesia Associates, Inc.

Submitter : Dr. Anne Wilhite
Organization : Virginia Society of Anesthesiologists
Category : Physician

Date: 07/12/2007

Issue Areas/Comments

GENERAL

GENERAL

See letter attached

CMS-1385-P-1735-Attach-1.TXT

CMS-1385-P-1735-Attach-2.TXT

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

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

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

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

Submitter : Dr. Bradley Egbert
Organization : Kettering Anesthesia Associates, Inc.
Category : Physician

Date: 07/12/2007

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.

Bradley Egbert, M.D.
Kettering Anesthesia Associates, Inc.

Submitter : Mr. Andrew Porter
Organization : ASA medical student delegation
Category : Academic

Date: 07/12/2007

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.

CMS-1385-P-1737-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.

Submitter : Dr. Larry Eldenburg
Organization : Kettering Anesthesia Associates, Inc.
Category : Physician

Date: 07/12/2007

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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Thank you for your consideration of this serious matter.

Larry Eldenburg, M.D.
Kettering Anesthesia Associates, Inc.

Submitter : Dr. Randall Smith
Organization : Bend Anesthesiology Group
Category : Physician

Date: 07/12/2007

Issue Areas/Comments

GENERAL

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

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

Randall Smith, MD
President
Bend Anesthesiology Group

Submitter : Dr. Michael Gifford
Organization : Kettering Anesthesia Associates, Inc.
Category : Physician

Date: 07/12/2007

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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Anesthesia Coding (Part of 5-Year Review)

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Thank you for your consideration of this serious matter.

Michael Gifford, M.D.
Kettering Anesthesia Associates, Inc.

Submitter : Dr. David Grigg
Organization : Kettering Anesthesia Associates, Inc.
Category : Physician

Date: 07/12/2007

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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Baltimore, MD 21244-8018

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Thank you for your consideration of this serious matter.

David Grigg, M.D.
Kettering Anesthesia Associates, Inc.

Submitter : Dr. Hugh Dalton
Organization : Dr. Hugh Dalton
Category : Physician

Date: 07/12/2007

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.
Hugh Dalton, MD

Submitter : Dr. Scot Ghivizzani
Organization : South Lake Anesthesia Services
Category : Physician

Date: 07/12/2007

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.

D. Scot Ghivizzani, M.D.

Submitter : Dr. Roy Haines
Organization : Kettering Anesthesia Associates, Inc.
Category : Physician

Date: 07/12/2007

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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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.

Roy Haines, M.D.
Kettering Anesthesia Associates, Inc.

Submitter : Miss.
Organization : Miss.
Category : Physician

Date: 07/12/2007

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 : Mrs. Debbie Gordon
Organization : Anesthesia Consultants Medical Group, P.C.
Category : Individual

Date: 07/12/2007

Issue Areas/Comments

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

Coding-- Additional Codes From 5-Year Review

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Thank you for your consideration of this serious matter.

Sincerely,
Debbie Gordon
Executive Director for Pain Management
Anesthesia Consultants Medical Group, P.C.

Submitter : Dr. Joel Johnson
Organization : Associated Anesthesiologists, P.C.
Category : Physician

Date: 07/12/2007

Issue Areas/Comments

GENERAL

GENERAL

July 12, 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
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Thank you for your consideration of this serious matter.

Sincerely,

Joel M. Johnson, M.D.
Associated Anesthesiologists, PC

Submitter : Dr. andrey apinis
Organization : mount sinai hospital, new york, ny
Category : Physician

Date: 07/12/2007

Issue Areas/Comments

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

Coding-- Additional Codes From 5-Year Review

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

Submitter : Dr. Thomas Davis
Organization : Washington University
Category : Health Care Professional or Association

Date: 07/12/2007

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. As an educator and instructor the proposed reduced fee schedule will greatly impact academic professionals and their ability to teach anesthesiology. 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. As you are aware, this age group needs and deserves the best trained anesthesiologists.

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Thank you for your consideration of this serious matter.

Thomas A. Davis, MD
Associate Professor
Department of Anesthesiology
Washington University
St. Louis, MO

Submitter : Dr. David Blaylock
Organization : Wise County Anesthesia
Category : Physician

Date: 07/12/2007

Issue Areas/Comments

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David Blaylock, D.O.