

Submitter : Dr. Nathan Orgain
Organization : Fletcher Allen Health Care
Category : Physician

Date: 07/18/2007

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. 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. Roger Spencer
Organization : Dr. Roger Spencer
Category : Physician

Date: 07/18/2007

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)

Dear Ms. Norwalk:

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Submitter : Dr. Andrew Walker
Organization : Dr. Andrew Walker
Category : Physician

Date: 07/18/2007

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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Andrew Walker, M.D.

Submitter : Dr. Laura Riehm
Organization : Dr. Laura Riehm
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

Resource-Based PE RVUs

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Thank you for your consideration of this serious matter.

Sincerely, Laura Riehm, M.D.

Submitter : Dr. Robert Ardis
Organization : physician
Category : Physician

Date: 07/18/2007

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)

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. (I was paid \$25/unit for 5 units per hour when I started practice in 1987) 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.

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Thank you for your consideration of this serious matter.

Robert J Ardis MD
2521 East 5th St
Duluth, MN 55812

Submitter : Dr. Vafa Foroughi
Organization : Dr. Vafa Foroughi
Category : Physician

Date: 07/18/2007

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 would like to express to you how pleased I was to hear that there is finally some action towards rectifying the underpayment of anesthesia services. Regardless of the 'higher calling' that comes with being a physician, at the end of the day, bills need to be paid and quality people need to be employed. One of many measures of how one can retain quality anesthesia providers is the ability to generate revenue. At 30-40% of revenue compared to non-Medicare patients, it is not a mystery that anesthesia providers may not be in the best of moods while taking care of Medicare patients and losing money. Therefore, 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.

Vafa Foroughi, MD

Submitter : Dr. James Weller
Organization : Anesthesia Group Practice, Inc.
Category : Physician

Date: 07/18/2007

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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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. Tripti Kataria
Organization : Dr. Tripti Kataria
Category : Physician

Date: 07/18/2007

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.

Tripti C. Kataria, MD, MPH

Chicago, IL

Submitter : Dr. Legia Mondesir
Organization : Dr. Legia Mondesir
Category : Physician

Date: 07/18/2007

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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Submitter : Dr. Brian McAllister
Organization : University of Utah
Category : Physician

Date: 07/18/2007

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

Rc: CMS-1385-P
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Submitter : ALEC HOVAGIM

Date: 07/18/2007

Organization : ALEC HOVAGIM

Category : Physician

Issue Areas/Comments

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Thank you for your consideration of this serious matter.

Sincerely, Alec R. Hovagim, M.D.
7780 e. overlook drive
Scottsdale, AZ 85255

Submitter : Dr. Peggy Duke
Organization : Emory Healthcare
Category : Physician

Date: 07/18/2007

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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Sincerely,
Peggy G. Duke, M.D.

Submitter : JANIE RAYMOND
Organization : JANIE RAYMOND
Category : Individual

Date: 07/18/2007

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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Submitter : Dr. Thomas Giuliano
Organization : Valley Anesthesia Associates
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

GENERAL

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Comment Letter:

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

Re: CMS-1385-P

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Submitter : Dr. Andrew Faraci
Organization : Valley Anesthesia Associates
Category : Physician

Date: 07/18/2007

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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Submitter : Dr. Matthew Jacobson
Organization : Dr. Matthew Jacobson
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

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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.

Matthew W Jacobson, M.D.

Submitter : Dr. Michael Kincaid

Date: 07/18/2007

Organization : ASA

Category : Physician

Issue Areas/Comments

GENERAL

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

Sincerely,

Michael S. Kincaid, M.D.

Submitter : Dr. Melinda Faier

Date: 07/18/2007

Organization : New York Presbyterian Hospital-Columbia

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

I support the proposed Medicare/Medicaid anesthesia reimbursement increase. I believe it critical to ensuring continued access to high quality care for patients insured under these programs. Thank you.

Submitter : Dr. Robert Griffin

Date: 07/18/2007

Organization : ASA

Category : Physician

Issue Areas/Comments

GENERAL

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

Robert S. Griffin, M.D.

Submitter : Dr. Jason Walker

Date: 07/18/2007

Organization : Dr. Jason Walker

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

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

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

Dear Ms. Norwalk:

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Thank you for your consideration of this serious matter.

Jason Walker MD

Submitter : Dr. Dawn Dillman
Organization : Dr. Dawn Dillman
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

GENERAL

GENERAL

Rc: CMS-1385-P
Ancsthesia Coding (Part of 5-Year Rcvew)

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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.
Dawn Dillman, MD

Submitter : Dr. Mark Melman
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/18/2007

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:

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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 : Mrs. Laura Tarlow
Organization : New Jersey Anesthesia Associates
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

Submitter : Dr. James Rowe
Organization : South Valley Anesthesia, P.A.
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

GENERAL

GENERAL

Re: Anesthesia Coding

Dear Ms. Norwalk:

I strongly support the proposal to increase anesthesia payments under the 2008 Physician Fee Schedule. I greatly appreciate that CMS has reeognized the current significant undervaluation of anesthesia services, compared to other physician services.

The current Medicare payment of just \$16.19 per unit does not cover the cost of providing anesthesia services to our nation's senior citizens, which in effect, is forcing anesthesiologists away from areas where a disproportionately high Medicare population live.

In an effort to correct this unsustainable situation, the RUC has recommended to CMS for the anesthesia conversion factor to increase by nearly \$4.00 per anesthesia unit, in order to offset the currently calculated 32% work undervaluation for anesthesia services.

To ensure senior citizen access to physician anesthesia services, I fully support the RUC recommendation, and strongly encourage the CMS to follow through with the proposal in the Federal Registrar.

Thank you for your consideration,
James Rowe, M.D.

Submitter : Dr. Keun Sam Chung

Date: 07/18/2007

Organization : Yale University

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

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

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

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

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.

Keun Sam Chung, M.D

Submitter : Dr. Stephen Santi
Organization : Anesthesia Medical Group/ ASA
Category : Physician

Date: 07/18/2007

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 support of 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 steps are being taken toward addressing this issue. I believe that this is a very serious matter.

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 later, 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 would be a major step toward 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 and implement the anesthesia conversion factor increase as recommended by the RUC immediately.

Thank you for your consideration.
Stephen F. Santi, M.D.

Submitter : Dr. Marc Rozner
Organization : Univ Tx MD Anderson Cancer Center
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

GENERAL

GENERAL

Dear Ms. Norwalk:

I have been an anesthesiologist for 17 years, all of which have been at academic institutions. I am pleased that CMS has recognized the undervaluation of anesthesia services, and that the Agency is taking steps to address this complicated issue. So I am writing to express my support for the proposal to increase anesthesia payments under the 2008 Physician Fee Schedule.

When the RBRVS was instituted, it created a payment disparity for anesthesia care, mostly due to the 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. As you are aware, this amount does not cover the cost of caring for our nation's seniors. Additionally, it 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 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 increase will 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,
Marc A Rozner, PhD, MD
Professor of Anesthesiology
The University of Texas M D Anderson Cancer Center

713-792-5036 (office)
713-745-2956 (fax)

Submitter : Richard Bradshaw
Organization : Richard Bradshaw
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

GENERAL

GENERAL

Dear CMS,

I strongly support increasing RBRVS anesthesiology reimbursement fee structure.

Submitter : Dr. Daniel Dahl
Organization : Gateway Anesthesia Associates, PLLC
Category : Physician

Date: 07/18/2007

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,

Daniel A. Dahl M.D.

Submitter : Dr. John Azzariti
Organization : Dr. John Azzariti
Category : Physician

Date: 07/18/2007

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.

Submitter : Dr. Sherif H. Tewfik
Organization : Associated Anesthesiologists, PC
Category : Physician

Date: 07/18/2007

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.

Sherif H. Tewfik, MD

Submitter : Dr. Caroline McKillop

Date: 07/18/2007

Organization : MUSC

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

See attachment

CMS-1385-P-3142-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.

Caroline C. McKillop MD
cunningc@musc.edu
Anesthesia Resident
Medical University of South Carolina
Charleston, SC

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

Date: 07/18/2007

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

Rc: CMS-1385-P

Anesthesia Coding (Part of 5-Year Review)

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Thank you for your consideration of this serious matter.

Sincerely,

Scott Homelstein M.D.

Submitter : Dr. Jeff Anderson

Date: 07/18/2007

Organization : Dr. Jeff Anderson

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. It affects not only our present but our future as well as young people, such as my son, look at the future of medicine in our country. They must see sustainable options for career choices, especially in concentrated Medicare populations, such as ours in Iowa.

Sincerely,
Jeff Anderson, M.D.

Submitter :

Date: 07/18/2007

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

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Thank you for your consideration of this serious matter.

Johannes Peters M.D.

Submitter : Dr. Glen Strange
Organization : Anesthesia Medical Group
Category : Physician

Date: 07/18/2007

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 and implement the anesthesia conversion factor increase as recommended by the RUC immediately.

Thank you for your consideration.

Sincerely,
Glen Strange, M.D.

Submitter : Dr. Jennifer Dollar
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/18/2007

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,

Jennifer R. Dollar, M.D.

Submitter : Dr. R. Hill Johnson
Organization : Old Pueblo Anesthesia
Category : Physician

Date: 07/18/2007

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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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.

In areas of the country like Southern Arizona, with significant numbers of retirees, this increase would go a long way towards preventing a mass exodus of critically needed anesthesiologists.

Thank you for your consideration of this serious matter.

R. Hill Johnson, M.D.

Submitter : Dr. Ian Chait
Organization : Allied Anesthesia
Category : Physician

Date: 07/18/2007

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

Rc: 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.

Ian Chait MD

Submitter : Dr. andrew fischer
Organization : atlantic anesthesia
Category : Physician

Date: 07/18/2007

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.
respectfully,
andrew fischer, md

Submitter : Dr. andrew fischer
Organization : atlantic anesthesia
Category : Physician

Date: 07/18/2007

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

Rc: CMS-1385-P

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Thank you for your consideration of this serious matter.
respectfully,
andrew fischer, md

Submitter : Dr. Deborah Williams
Organization : Dr. Deborah Williams
Category : Physician

Date: 07/18/2007

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. Stephen C. Ellis
Organization : Anesthesia Associates of Kansas City
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

GENERAL

GENERAL

Dear Sir/ Madam:

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Thank you for your consideration of this serious matter.

Sincerely,
Stephen C Ellis MD

Submitter :

Date: 07/18/2007

Organization :

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

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

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

Submitter : Dr. Thomas Farrell
Organization : Anesthesia Service Medical Group
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

GENERAL

GENERAL

See attachment

CMS-1385-P-3155-Attach-1.DOC

CMS-1385-P-3155-Attach-2.DOC

CMS-1385-P-3155-Attach-3.TXT

CMS-1385-P-3155-Attach-4.DOC

CMS-1385-P-3155-Attach-5.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. Norman Levin
Organization : Dr. Norman Levin
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

GENERAL

GENERAL

See attachment

#3156

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. Ashokkumar Patel
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/18/2007

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.

Ashokkumar J. Patel, MD
Chairman, Dept. of Anesthesiology
Cape Regional Medical Center
2- Stone Harbor Blvd
Cape May Court House, NJ 08210

Submitter : Dr. Edward Nemergut
Organization : Dr. Edward Nemergut
Category : Physician

Date: 07/18/2007

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. Thomas Kelly
Organization : Associated Anesthesiology Practice
Category : Physician

Date: 07/18/2007

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.

With Regards,
Thomas E. Kelly III, M.D.

Submitter :

Date: 07/18/2007

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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Thank you for your consideration of this serious matter.

Submitter : Dr. Michael Holmes
Organization : Pinnacle Anesthesia Consultants
Category : Physician

Date: 07/18/2007

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. Jan Boublik
Organization : Brigham and Womens Hospital
Category : Physician Assistant

Date: 07/18/2007

Issue Areas/Comments

GENERAL

GENERAL

Jan Boublik, MD PhD
1600 Beacon St, Apt 302
Brookline, MA 02446

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,

Jan Boublik, MD PhD

Submitter : Gary Morton
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/18/2007

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

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

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Sincerely,

Gary H. Morton, M.D.

Submitter : Dr. Christopher Duggins
Organization : PAAPA
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

GENERAL

GENERAL

See Attachment (Word file)

CMS-1385-P-3164-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.

Christopher Jay Duggins, M.D.
07/18/2007

Submitter : Dr. george ash
Organization : anesthesia associates
Category : Physician

Date: 07/18/2007

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.

George E. Ash, Jr., M.D.

Submitter : Dr. Michael Flynn

Date: 07/18/2007

Organization : American Society of Anesthesiologists

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

see attachment

#3166

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. Lisa Soranno
Organization : Oakwood Hospital
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-3167-Attach-1.DOC

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

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

Dear Ms. Norwalk:

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. Jeffrey Yeh
Organization : Medical College of Wisconsin Affiliated Hospitals
Category : Physician

Date: 07/18/2007

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
Baltimore, MD 21244-8018

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Submitter : Dr. Edward Maybury
Organization : Dr. Edward Maybury
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

Medicare Economic Index (MEI)

Medicare Economic Index (MEI)

As a physician in the trenches taking care of medicare beneficiaries every day it is critical that the reimbursement for physician services, and anesthesia services in particular, be radically changed to reflect the actual costs of delivering these services. Medicare payments for anesthesia services are a small fraction of market rates for any other insurer except medicaid. Medicare patients are an economic burden to practices, who must rely on commercial insurers to pay more than their fair share to subsidize the medicare patients. Medicare payments for anesthesia services do not come close to covering the personell costs of providing these services. We take care of these patients because it is the right thing to do, but it is becoming economically untenable for us to continue to do so.

Please take this opportunity to redress the gross inequity in physician payments for anesthesia services to medicare patients. As commercial insurers have ratcheted down payments, it is becoming increasingly difficult to economically justify taking care of medicare patients.

Submitter : Dr. Yury Khelemsky
Organization : Mount Sinai Medical Center
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

GENERAL

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

Sincerely,

Yury Khelemsky, M.D.
Department of Anesthesiology
Mount Sinai Medical Center
New York, NY

Submitter : Dr. Mark Twite
Organization : The Children's Hospital
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

GENERAL

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

Dr. Mark Twite

Submitter : Dr. Michael Sakowski
Organization : Pinnacle Anesthesia
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

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Thank you for your consideration of this serious matter.

Submitter : Dr. Michael Miller
Organization : ACI,LLC
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

GENERAL

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

Sincerely,
Michael D. Miller, MD

Submitter :

Date: 07/18/2007

Organization :

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

July 18th, 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,

Ichiro Otsu, MD

Member, American Society of Anesthesiologists

Submitter : Dr. Henry Chen
Organization : Mt. Sinai Medical Center
Category : Physician

Date: 07/18/2007

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. Jayaram Srivatsan
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/18/2007

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
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Thank you for your consideration of this serious matter.

Submitter : Dr. Richard Meshulam
Organization : First Colony Anesthesia Associates
Category : Physician

Date: 07/18/2007

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

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Thank you for your consideration of this serious matter.

Yours Truly,

Richard Meshulam

Submitter : Miss. Deneene Doyker

Date: 07/18/2007

Organization : University of CT School of Med-Anesthesiology

Category : Other Health Care Professional

Issue Areas/Comments

GENERAL

GENERAL

I am in support of an increase in reimbursement as it will promote the high level of care our patients expect and deserve through better training, facilities and equipment. One can never predict if a loved one or even oneself may be found on the receiving end of care. What would it be like to be a patient receiving mediocre care due to a financial restraint? I advocate for the increase for my future patients, whoever they may be. My standards are set high for them where nothing but the best and highest quality is sufficient. Please thoughtfully consider to vote in favor for the increase to help to not only maintain, but exceed the level of care we can provide.

Submitter : Dr. Matthew Atlas

Date: 07/18/2007

Organization : AZSA 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

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

Matthew Atlas, M.D.
Old Pueblo Anesthesia
5700 E. Pima, Ste E
Tucson, AZ 85712

Submitter : Dr. Tim Graham
Organization : Dr. Tim Graham
Category : Physician

Date: 07/18/2007

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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Submitter : Dr. Michael Ietta
Organization : Dr. Michael Ietta
Category : Physician

Date: 07/18/2007

Issue Areas/Comments

GENERAL

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Acting Administrator
Centers for Medicare and Medicaid Services
Attention: CMS-1385-P
P.O. Box 8018
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Submitter : Dr. Faustino Gonzalez
Organization : Dr. Faustino Gonzalez
Category : Physician

Date: 07/19/2007

Issue Areas/Comments

GENERAL

GENERAL

CMS-1385-P See Attachment

Submitter : Dr. Faustino Gonzalez
Organization : Dr. Faustino Gonzalez
Category : Physician

Date: 07/19/2007

Issue Areas/Comments

GENERAL

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CMS-1385-P See Attached

CMS-1385-P-3183-Attach-1.DOC

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

Faustino M. Gonzalez, M.D.

Submitter : Dr. Joseph Kryc
Organization : Red Mountain Anesthesiologists
Category : Physician

Date: 07/19/2007

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

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

Submitter : Dr. Glen Feather
Organization : Associated Anesthesiologists, SC
Category : Physician

Date: 07/19/2007

Issue Areas/Comments

GENERAL

GENERAL

I recently retired from the Illinois Army National Guard. I had to step down as the State Surgeon of the ILARNG. I could not afford to continue my involvement with the army due to the rising number of Medicare patients in our practice. In the past 17 years my medicare reimbursement has gone from \$14/ unit to \$16/ unit. A 12.5% increase in that time span. I have been deployed twice overseas and can no longer afford the financial hit from the army and Medicare. The army is critically short of physicians. Without better reimbursement from Medicare and medicaid, I believe it will only get worse for the Guard and Reserve. Please reconsider your fee schedule for Anesthesiology.

Submitter : Dr. Aruna Patil
Organization : Dr. Aruna Patil
Category : Physician

Date: 07/19/2007

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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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. Nancy Grey

Date: 07/19/2007

Organization : Dr. Nancy Grey

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

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

Re: CMS-1385-P

Anesthesia Coding (Part of 5-Year Review)

Dear Ms. Norwalk:

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

Thank you for your consideration of this serious matter.

Submitter : Dr. Curtis Maslen
Organization : Washington State Society of Anesthesiologists
Category : Physician

Date: 07/19/2007

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 support for the proposed increase in anesthesia payments under the 2008 Physician Fee Schedule. Anesthesia services are significantly undervalued relative to other surgical specialties, and I am glad that the Agency is taking steps to address this complicated issue.

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

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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.

Curtis R. Maslen MD
Seattle, WA

Submitter : Dr. Susan Bolton
Organization : VCUHS
Category : Physician

Date: 07/19/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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

Sincerely yours,

Susan Cross Bolton, MD, JD

Submitter : Dr. Timothy Mooney
Organization : Mount Sinai Medical Center
Category : Physician

Date: 07/19/2007

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.

Timothy Mooney, MD
Mount Sinai Medical Center
New York, NY

Submitter : Dr. James Schlessinger
Organization : Dr. James Schlessinger
Category : Physician

Date: 07/19/2007

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. Grant Crago
Organization : Twin Lakes Anesthesia, P.L.L.C.
Category : Physician

Date: 07/19/2007

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)

Dear Ms. Norwalk:

I wanted to thank CMS for proposing an increase in the anesthesia unit rate. Medicare payment for anesthesia services stands at just \$16.19 per unit. The average unit rate of our other payers excluding Medicaid is \$55 that is an amazing discrepancy, much larger than any of my surgical colleagues. This makes it difficult for us to recruit in our area where the Medicare is high.

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 help,

Grant Crago, M.D.

Submitter : Dr. Jeffrey Brand
Organization : Capitol Anesthesiology Association
Category : Physician

Date: 07/19/2007

Issue Areas/Comments

GENERAL

GENERAL

Jeffrey D. Brand, M.D.
Capitol Anesthesiology Association
3705 Medical Parkway, Ste. 570
Austin, TX 78705

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,

Jeffrey D. Brand, M.D.
Chief of Anesthesia
Seton Northwest Hospital
Austin, Texas

Submitter : Dr. J. Michael Vollers
Organization : University of Arkansas for Medical Sciences
Category : Physician

Date: 07/19/2007

Issue Areas/Comments

GENERAL

GENERAL

see attachment

CMS-1385-P-3194-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,

J. Michael Vollers, MD
Professor of Anesthesiology
University of Arkansas for Medical Sciences
Little Rock, AR
vollersjamesm@uams.edu

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

Date: 07/19/2007

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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Anesthesia Coding (Part of 5-Year Review)

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Thank you for your consideration of this serious matter.

Submitter : Dr. john garino
Organization : Dr. john garino
Category : Physician

Date: 07/19/2007

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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Submitter :

Date: 07/19/2007

Organization :

Category : Individual

Issue Areas/Comments

GENERAL

GENERAL

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

Submitter : Dr. george katele
Organization : Dr. george katele
Category : Physician

Date: 07/19/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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Submitter :

Date: 07/19/2007

Organization :

Category : Individual

Issue Areas/Comments

GENERAL

GENERAL

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

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Thank you for your consideration of this serious matter.
Jacob Yen
1700 Elmhurst Avenue
Oklahoma City, OK 73120

Submitter : Dr. Erikka Washington
Organization : UT Medical School @ Houston
Category : Physician

Date: 07/19/2007

Issue Areas/Comments

Medicare Economic Index (MEI)

Medicare Economic Index (MEI)

Anesthesiologist provide an invaluable service to all patients receiving care from numerous other physicians. Our training is rigorous and our services provide humane conditions to intolerable medical pathologies and procedures. I support any increase in medicare re-imbursment to overworked, well trained physicians, dedicated to providing comfort to all those requiring medical intervention.

Submitter :

Date: 07/19/2007

Organization :

Category : Individual

Issue Areas/Comments

GENERAL

GENERAL

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

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Thank you for your consideration of this serious matter.
Jillian Yen
1700 Elmhurst Avenue
Oklahoma City, OK 73120

Submitter : Dr. Charles Ewell
Organization : Dr. Charles Ewell
Category : Federal Government

Date: 07/19/2007

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. Michelle Taylor
Organization : Anesthesia Associates of Gainesville, LLC
Category : Health Care Professional or Association

Date: 07/19/2007

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.

Michelle Taylor
Gainesville, Georgia

Submitter : Dr. Rose Andres
Organization : Rush University Medical Center
Category : Physician

Date: 07/19/2007

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.

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 yours, Rose Andres, M.D.

Submitter : Dr. Cynthia Wang

Date: 07/19/2007

Organization : Dr. Cynthia Wang

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

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

Re: CMS-1385-P

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Submitter : patti kymer
Organization : patti kymer
Category : Physician

Date: 07/19/2007

Issue Areas/Comments

GENERAL

GENERAL

Please support the medicare payment increase to anesthesiologists. This is a long overdue necessity that will certainly enable more adults to get optimum medical care. Thank you for your consideration.

Submitter : Dr. Jay Anderson
Organization : Carolina Anesthesia, P.C.
Category : Physician

Date: 07/19/2007

Issue Areas/Comments

GENERAL

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Jay A. Anderson, MD

Submitter : Dr. James Mesrobian
Organization : Summit Anesthesiology
Category : Physician

Date: 07/19/2007

Issue Areas/Comments

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Submitter :

Date: 07/19/2007

Organization :

Category : Physician

Issue Areas/Comments

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Submitter : Dr. Elvin Cruz

Date: 07/19/2007

Organization : ASA

Category : Physician

Issue Areas/Comments

GENERAL

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Elvin J. Cruz-Zeno, MD, MS
Anesthesiologist

Submitter : Dr. Artee Gandhi

Date: 07/19/2007

Organization : Dr. Artee Gandhi

Category : Physician

Issue Areas/Comments

Medicare Telehealth Services

Medicare Telehealth Services

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