

Submitter : Mrs. Lora Anderson
Organization : MAPS Medical Pain Clinic
Category : Physical Therapist

Date: 01/25/2008

Issue Areas/Comments

GENERAL

GENERAL

attachment

CMS-1392-FC-311-Attach-1.DOC

#311

December 18, 2007

Mr. Kerry Weems
Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Attention: MS-1392-FC
Hubert H. Humphrey Building, Room 445-G
200 Independence Avenue, SW
Washington, DC 20201

Re: MS-1392-FC

Dear Mr. Weems:

As a concerned staff member of an interventional pain management physician I would like to comment on multiple disparities which exist between ASC setting and HOPD setting. These disparities and the CMSs new proposals and classifications will hinder patient access.

I am concerned about status indicator for CPT Codes 72285 and 72295 and non-payable issue which is related to discography. CMS pays separately for radiology portion of discography when it is performed independently in the HOPD setting, however it does not pay separately for the very same service when it is performed independently in the ASC setting. It was our understanding that in spite of significant cuts for interventional pain management the whole purpose was to apply the standards uniformly but it does not seem so. Discography procedures have two components: an injection portion that is reported by either CPT Code 62290 (Injection procedure for discography, in lumbar spine) or CPT Cod 62291 (Injection procedure for discography in cervical or thoracic spine), and a radiology portion that is reported by either CPT Code 72285 (discography interpretation and supervision in cervical spine) or CPT Code 72295 (discography interpretation and supervision in lumbar spine).

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Thank you for the opportunity to comment on the Final Rule.

Sincerely,

Lora Anderson
MAPS Medical Pain Clinic
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Ms. Jona Annoni
Organization : MAPS Medical Pain Clinic
Category : Other Health Care Professional

Date: 01/25/2008

Issue Areas/Comments

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Sincerely,

Jona Annoni
MAPS Medical Pain Clinic
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Mr. Steve Antolick
Organization : MAPS Medical Pain Clinic
Category : Pharmacist

Date: 01/25/2008

Issue Areas/Comments

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Sincerely,

Steve Antolick
MAPS Medical Pain Clinic
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Mr. Jim Anway

Date: 01/25/2008

Organization : MAPS Medical Pain Clinic

Category : Nurse Practitioner

Issue Areas/Comments

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Sincerely,

Jim Anway
MAPS Medical Pain Clinic
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Ms. Maggie Ayers

Date: 01/27/2008

Organization : MAPS Medical Pain Clinics

Category : Other Health Care Professional

Issue Areas/Comments

GENERAL

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attachment

CMS-1392-FC-315-Attach-1.DOC

#315-

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Sincerely,

Maggie Ayers
MAPS Medical Pain Clinic
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Ms. Trisha Ball
Organization : MAPS Medical Pain Clinics
Category : Other Health Care Professional

Date: 01/27/2008

Issue Areas/Comments

GENERAL

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Sincerely,

Trisha Ball
MAPS Medical Pain Clinic
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Ms. Kristen Bebeau
Organization : MAPS Medical Pain Clinics
Category : Nurse

Date: 01/27/2008

Issue Areas/Comments

GENERAL

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Sincerely,

Kristen Bebeau
MAPS Medical Pain Clinic
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Ms. Sarah Behun
Organization : MAPS Medical Pain Clinics
Category : Other Health Care Professional

Date: 01/27/2008

Issue Areas/Comments

GENERAL

GENERAL

attachments

#318

file:///T:/ELECTRONIC%20COMMENTS/ELECTRONIC%20COMMENTS/E-Comments/Active%20Files/Missing%20file1.txt

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

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

Submitter : Ms. Peg Beltrand
Organization : MAPS Medical Pain Clinics
Category : Nurse
Issue Areas/Comments

Date: 01/27/2008

GENERAL

GENERAL

attachments

CMS-1392-FC-319-Attach-1.DOC

#319

December 18, 2007

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200 Independence Avenue, SW
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Sincerely,

Peg Beltrand
MAPS Medical Pain Clinic
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Ms. Lisa Benedetto
Organization : MAPS Medical Pain Clinics
Category : Nurse Practitioner

Date: 01/27/2008

Issue Areas/Comments

GENERAL

GENERAL

attachment

#320

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

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

Submitter : Ms. Rhonda Blomquist
Organization : MAPS Medical Pain Clinics
Category : Other Health Care Professional

Date: 01/27/2008

Issue Areas/Comments

GENERAL

GENERAL

attachment

CMS-1392-FC-321-Attach-1.DOC

#3217

December 18, 2007

Mr. Kerry Weems
Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Attention: MS-1392-FC
Hubert H. Humphrey Building, Room 445-G
200 Independence Avenue, SW
Washington, DC 20201

Re: MS-1392-FC

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Rhonda Blomquist
MAPS Medical Pain Clinic
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Ms. Jackie Bohannon
Organization : MAPS Medical Pain Clinics
Category : Other Health Care Professional

Date: 01/27/2008

Issue Areas/Comments

GENERAL

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#322

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Submitter : Ms. Annette Boller
Organization : MAPS Medical Pain Clinics
Category : Nurse

Date: 01/27/2008

Issue Areas/Comments

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December 18, 2007

Mr. Kerry Weems
Administrator
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Hubert H. Humphrey Building, Room 445-G
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Annette Boller
MAPS Medical Pain Clinic
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Ms. Wendy Borchart
Organization : MAPS Medical Pain Clinic
Category : Other Health Care Professional

Date: 01/27/2008

Issue Areas/Comments

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

Submitter : Ms. Darcy Brisbin
Organization : MAPS Medical Pain Clinics
Category : Physical Therapist

Date: 01/27/2008

Issue Areas/Comments

GENERAL

GENERAL

attachment

CMS-1392-FC-326-Attach-1.DOC

#326

December 18, 2007

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Administrator
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Darcy Brisbin
MAPS Medical Pain Clinic
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Ms. Diane Budnick
Organization : MAPS Medical Pain Clinic
Category : Nurse
Issue Areas/Comments

Date: 01/27/2008

GENERAL

GENERAL

attachment

#327

file:///T:/ELECTRONIC%20COMMENTS/ELECTRONIC%20COMMENTS/E-Comments/Active%20Files/Missing%20file1.txt

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 : Ms. Megan Budnick
Organization : MAPS Medical Pain Clinic
Category : Other Health Care Professional

Date: 01/27/2008

Issue Areas/Comments

GENERAL

GENERAL

attachment

#328

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

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

Submitter : Ms. Mindy Chivers
Organization : MAPS Medical Pain Clinics
Category : Other Health Care Professional

Date: 01/27/2008

Issue Areas/Comments

GENERAL

GENERAL

attachments

CMS-1392-FC-329-Attach-1.DOC

329

December 18, 2007

Mr. Kerry Weems
Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Attention: MS-1392-FC
Hubert H. Humphrey Building, Room 445-G
200 Independence Avenue, SW
Washington, DC 20201

Re: MS-1392-FC

Dear Mr. Weems:

As a concerned staff member of an interventional pain management physician I would like to comment on multiple disparities which exist between ASC setting and HOPD setting. These disparities and the CMS's new proposals and classifications will hinder patient access.

I am concerned about status indicator for CPT Codes 72285 and 72295 and non-payable issue which is related to discography. CMS pays separately for radiology portion of discography when it is performed independently in the HOPD setting, however it does not pay separately for the very same service when it is performed independently in the ASC setting. It was our understanding that in spite of significant cuts for interventional pain management the whole purpose was to apply the standards uniformly but it does not seem so. Discography procedures have two components: an injection portion that is reported by either CPT Code 62290 (Injection procedure for discography, in lumbar spine) or CPT Code 62291 (Injection procedure for discography in cervical or thoracic spine), and a radiology portion that is reported by either CPT Code 72285 (discography interpretation and supervision in cervical spine) or CPT Code 72295 (discography interpretation and supervision in lumbar spine).

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Thank you for the opportunity to comment on the Final Rule.

Sincerely,

Mindy Chivers
MAPS Medical Pain Clinics
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Ms. Mindy Chivers
Organization : MAPS Medical Pain Clinics
Category : Other Health Care Professional

Date: 01/27/2008

Issue Areas/Comments

GENERAL

GENERAL

attachment

CMS-1392-FC-330-Attach-1.DOC

330

December 18, 2007

Mr. Kerry Weems
Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Attention: MS-1392-FC
Hubert H. Humphrey Building, Room 445-G
200 Independence Avenue, SW
Washington, DC 20201

Re: MS-1392-FC

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Thank you for the opportunity to comment on the Final Rule.

Sincerely,

Lindsey Christensen
MAPS Medical Pain Clinics
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Ms. Laurie Curtis
Organization : MAPS Medical Pain Clinic
Category : Other Health Care Professional

Date: 01/27/2008

Issue Areas/Comments

GENERAL

GENERAL

attachment

CMS-1392-FC-331-Attach-1.DOC

331

December 18, 2007

Mr. Kerry Weems
Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Attention: MS-1392-FC
Hubert H. Humphrey Building, Room 445-G
200 Independence Avenue, SW
Washington, DC 20201

Re: MS-1392-FC

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Thank you for the opportunity to comment on the Final Rule.

Sincerely,

Jamie Cottom
MAPS Medical Pain Clinics
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Ms. Jamie Cottom
Organization : MAPS Medical Pain Clinic
Category : Health Care Provider/Association

Date: 01/27/2008

Issue Areas/Comments

GENERAL

GENERAL

attachment

CMS-1392-FC-332-Attach-1.DOC

December 18, 2007

Mr. Kerry Weems
Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Attention: MS-1392-FC
Hubert H. Humphrey Building, Room 445-G
200 Independence Avenue, SW
Washington, DC 20201

Re: MS-1392-FC

Dear Mr. Weems:

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Thank you for the opportunity to comment on the Final Rule.

Sincerely,

Jamie Cottom
MAPS Medical Pain Clinics
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Ms. Laurie Curtis
Organization : MAPS Medical Pain Clinics
Category : Other Health Care Professional

Date: 01/27/2008

Issue Areas/Comments

GENERAL

GENERAL

attachment

CMS-1392-FC-333-Attach-1.DOC

December 18, 2007

Mr. Kerry Weems
Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Attention: MS-1392-FC
Hubert H. Humphrey Building, Room 445-G
200 Independence Avenue, SW
Washington, DC 20201

Re: MS-1392-FC

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Thank you for the opportunity to comment on the Final Rule.

Sincerely,

Laurie Curtis
MAPS Medical Pain Clinics
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Ms. Jaime Donald
Organization : MAPS Medical Pain Clinics
Category : Other Health Care Professional

Date: 01/27/2008

Issue Areas/Comments

GENERAL

GENERAL

attachment

CMS-1392-FC-334-Attach-1.DOC

#334

December 18, 2007

Mr. Kerry Weems
Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Attention: MS-1392-FC
Hubert H. Humphrey Building, Room 445-G
200 Independence Avenue, SW
Washington, DC 20201

Re: MS-1392-FC

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Thank you for the opportunity to comment on the Final Rule.

Sincerely,

Jaime Donald
MAPS Medical Pain Clinics
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Ms. Laura Dresser
Organization : MAPS Medical Pain Clinics
Category : Other Health Care Professional

Date: 01/27/2008

Issue Areas/Comments

GENERAL

GENERAL

attachment

CMS-1392-FC-335-Attach-1.DOC

#335-

December 18, 2007

Mr. Kerry Weems
Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Attention: MS-1392-FC
Hubert H. Humphrey Building, Room 445-G
200 Independence Avenue, SW
Washington, DC 20201

Re: MS-1392-FC

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Sincerely,

Laura Dresser
MAPS Medical Pain Clinics
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Ms. Mary Dubel
Organization : MAPS Medical Pain Clinics
Category : Other Health Care Professional

Date: 01/27/2008

Issue Areas/Comments

GENERAL

GENERAL

attachment

CMS-1392-FC-336-Attach-1.DOC

#336

December 18, 2007

Mr. Kerry Weems
Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Attention: MS-1392-FC
Hubert H. Humphrey Building, Room 445-G
200 Independence Avenue, SW
Washington, DC 20201

Re: MS-1392-FC

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Sincerely,

Mary Dubel
MAPS Medical Pain Clinics
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Ms. Amie Ecker

Date: 01/27/2008

Organization : MAPS Medical Pain Clinic

Category : Other Health Care Professional

Issue Areas/Comments

GENERAL

GENERAL

attachment

CMS-1392-FC-337-Attach-1.DOC

#337

December 18, 2007

Mr. Kerry Weems
Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Attention: MS-1392-FC
Hubert H. Humphrey Building, Room 445-G
200 Independence Avenue, SW
Washington, DC 20201

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Sincerely,

Amie Ecker
MAPS Medical Pain Clinics
2104 Northdale Blvd, NW
Minneapolis, MN
55433

Submitter : Mr. Jeremy Ellis
Organization : MAPS Medical Pain Clinics
Category : Other Health Care Professional

Date: 01/27/2008

Issue Areas/Comments

GENERAL

GENERAL

attachment

#338

file:///T:/ELECTRONIC%20COMMENTS/ELECTRONIC%20COMMENTS/E-Comments/Active%20Files/Missing%20file1.txt

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

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

Submitter : Ms. Mary Esslinger
Organization : MAPS Medical Pain Clinics
Category : Nurse Practitioner
Issue Areas/Comments

Date: 01/27/2008

GENERAL

GENERAL

attachment

#339

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

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