

**Submitter :** Dr. Rebecca Stene  
**Organization :** Dr. Rebecca Stene  
**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:

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 :** Mrs. Lorrie Wu  
**Organization :** Mrs. Lorrie Wu  
**Category :** Individual

**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

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**Submitter :** Miss. Sierra Wu  
**Organization :** Miss. Sierra Wu  
**Category :** Individual

**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

Rc: CMS-1385-P

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**Submitter :** Miss. Victoria Wu  
**Organization :** Miss. Victoria Wu  
**Category :** Individual

**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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**Submitter :** Dr. Rebecca Burfeind  
**Organization :** Anesthesia Associates of Kansas City  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

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**Submitter :** Miss. Angelina Wu  
**Organization :** Miss. Angelina Wu  
**Category :** Individual

**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.

**Submitter :** Dr. Kyle Roach  
**Organization :** Dr. Kyle Roach  
**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  
Anesthesia Coding (Part of 5-Year Review)

Dear Ms. Norwalk:

I am writing in hopes to assure that the proposal to increase anesthesia payments under the 2008 Physician Fee Schedule becomes permanent. CMS has duly recognized the far too longstanding undervaluation of anesthesia services, and I trust that the Agency will take the appropriate steps to reverse the serious inequity in valuation of physician services that has long plagued anesthesiologists.

When the RBRVS was instituted, our nation's seniors were done a grave disservice by instituting a very large disparity in physician valuation. This sent a clear message that an entire field of subspecialty-trained physicians was less necessary and less important than any other physicians. Anesthesiology is the only field that actively participates in the care of EVERY SINGLE surgical patient throughout the country on a daily basis. I assure you, that as our nation ages, develops significant medical problems and then chooses to undergo elective surgical procedures, the ability to place a patient into a controlled comatose (i.e., anesthetized) state and subsequently remove that patient from that state is a very important subspecialty indeed.

The RUC recommended that CMS increase the anesthesia conversion factor to offset a calculated 32 percent work undervaluation. I fully support this increase. In fact, it is vitally necessary. Anesthesia services directed by physicians (i.e., anesthesiologists) have been proven safer and far superior to other care. In order to prevent existing and future anesthesiologists from choosing not to practice in settings with high Medicare/Medicaid populations, this is an undeniably necessary increase. To ensure that our nation's aging population continues to have access to the very best 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 :**

**Date: 07/12/2007**

**Organization :**

**Category : Physician**

**Issue Areas/Comments**

**Medicare Economic Index (MEI)**

Medicare Economic Index (MEI)

Re: CMS-1385-P

Anesthesia Coding (Part of 5-Year Review)

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Thank you for your consideration of this serious matter.



**Submitter :** Dr. Deborah Witham  
**Organization :** Wenatchee Anesthesia Assoc  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

It has long been recognised that Anesthesia Services are undervalued. As patient safety concerns have escalated the APSF has always taken the lead. It is time to ask for a fair wage for providing the quality of care and assuming the risk of the patient today.

**Submitter :**

**Date: 07/12/2007**

**Organization :**

**Category : Physician**

**Issue Areas/Comments**

**GENERAL**

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

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Thank you for your consideration of this serious matter.

**Submitter :** Dr. Heather Pulvermacher  
**Organization :** Dr. Heather Pulvermacher  
**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

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Thank you for your consideration of this serious matter.

**Submitter :** Dr. Aaron Even

**Date:** 07/12/2007

**Organization :** ASA

**Category :** Physician

**Issue Areas/Comments**

**GENERAL**

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

Sincerely,

Aaron Even MD

**Submitter :** Dr. Daniel Sessler  
**Organization :** The Cleveland Clinic  
**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  
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Daniel Sessler, M.D.  
Prof & Chair  
Department of Outcomes Research  
The Cleveland Clinic  
DS@OR.org

Submitter : Mr. steve tunstill

Date: 07/12/2007

Organization : Mr. steve tunstill

Category : Consumer Group

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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Rc: CMS-1385-P

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Thank you for your consideration of this serious matter.  
steve tunstill

**Submitter :** Dr. Brandon Abeyta  
**Organization :** Anesthesia Associates of New Mexico, P.C.  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

GENERAL

See Attachment

**Submitter :** Paula Vial

**Date:** 07/12/2007

**Organization :** Paula Vial

**Category :** Individual

**Issue Areas/Comments**

**Medicare Economic Index (MEI)**

Medicare Economic Index (MEI)

The thought of reducing Medicare payments to physicians will totally and completely remove healthcare from a lot of senior citizens. This is outrageous, and potentially devastating.



**Submitter :** Laureen Hill

**Date:** 07/12/2007

**Organization :** Laureen Hill

**Category :** Physician

**Issue Areas/Comments**

**GENERAL**

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Leslie V. Norwalk, Esq.  
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**Submitter :** Dr. Jeremy Boucher  
**Organization :** Northwest Anesthesia, P.C.  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

GENERAL

See Attachment

CMS-1385-P-1868-Attach-1.DOC

Leslie V. Norwalk, Esq.  
Acting Administrator  
Centers for Medicare and Medicaid Services  
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Jeremy M. Boucher, M.D.  
Physician, Northwest Anesthesia, P.C.  
3322 NW 112<sup>th</sup> Terrace  
Oklahoma City, OK 73120  
405-249-5170  
jeremybouchermd@gmail.com

**Submitter :** Jeff Lui  
**Organization :** Jeff Lui  
**Category :** Individual

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

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Re: CMS-1385-P

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Regards,  
Jeff Lui

**Submitter :** Mr. Dale Zeh, Jr.

**Date:** 07/12/2007

**Organization :** Pasadena Billing Associates

**Category :** Individual

**Issue Areas/Comments**

**GENERAL**

GENERAL

See Attachment

**Submitter :** James Rawls

**Date:** 07/12/2007

**Organization :** James Rawls

**Category :** Physician

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

As an anesthesiologist I hope that the powers that be will see fit to reimburse our specialty as well as others to a level that will insure the best care of our public. Please do the right thing. Thanks, James T. Rawls MD

**Submitter :** Marlene Santiago  
**Organization :** Nashua Anesthesia Partners  
**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:

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. John Haskins  
**Organization :** Dr. John Haskins  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**Impact**

**Impact**

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

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

John Haskins, M.D.



**Submitter :** Dr. Nathan Christie  
**Organization :** University of Wisconsin Hospitals  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

GENERAL

Please see Attachment.

CMS-1385-P-1874-Attach-1.DOC

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

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

Nathan Christie, M.D.

**Submitter :** Dr. Ramprasad Sripada  
**Organization :** Vanderbilt University  
**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  
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Thank you for your consideration of this serious matter.

**Submitter :** Dr. Adam Berg

**Date:** 07/12/2007

**Organization :** Anesthesia Associates of New Mexico, P.C.

**Category :** Physician

**Issue Areas/Comments**

**GENERAL**

GENERAL

See Attachment

CMS-1385-P-1876-Attach-1.DOC

CMS-1385-P-1876-Attach-2.DOC

July 12, 2007

Adam Berg, MD.  
Anesthesiologist  
Anesthesia Associates of New Mexico, P.C.  
1720 Louisiana Blvd NE, Suite 401  
Albuquerque, NM 87110

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,

Adam Berg, MD

**Submitter :** Dr. lata potturi  
**Organization :** asmg  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

I believe it is critical for anesthesiologists caring for medicare patients to be properly reimbursed. Current reimbursements are inadequate and should be increased. Thank you.

**Submitter :** Dr. Oscar Penate  
**Organization :** Cleveland Clinic  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**Resource-Based PE RVUs**

**Resource-Based PE RVUs**

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

Re: CMS-1385-P

Anesthesia Coding (Part of 5-Year Review)

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Continuation of this unfair rule will cause a severe shortage of anesthesiologists in areas where their expertise is required to care for our fellow Americans.

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.

As a physician in training, I can assure you that our patients will welcome your support in ensuring they receive the care they are in dire need of.

Sincerely,  
Oscar Penate, MD

**Submitter :** Dr. Bob Biazak

**Date:** 07/12/2007

**Organization :** Anesthesia Associates of New Mexico, P.C.

**Category :** Physician

**Issue Areas/Comments**

**GENERAL**

GENERAL

See attachment

CMS-1385-P-1879-Attach-1.DOC



July 12, 2007

Bob Biazak, MD.  
Anesthesiologist  
Anesthesia Associates of New Mexico, P.C.  
1720 Louisiana Blvd NE, Suite 401  
Albuquerque, NM 87110

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,

Bob Biazak, MD

**Submitter :** Dr. Gary Biazak  
**Organization :** Anesthesia Associates of New Mexico  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

GENERAL

See Attachment

CMS-1385-P-1880-Attach-1.DOC

July 12, 2007

Gary Biazak, MD.  
Anesthesiologist  
Anesthesia Associates of New Mexico, P.C.  
1720 Louisiana Blvd NE, Suite 401  
Albuquerque, NM 87110

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,

Gary Biazak, MD

**Submitter :** Dr. Andrew Black

**Date:** 07/12/2007

**Organization :** Anesthesia Associates of New Mexico, P.C.

**Category :** Physician

**Issue Areas/Comments**

**GENERAL**

GENERAL

See Attachment

CMS-1385-P-1881-Attach-1.DOC

July 12, 2007

Andrew Black, MD.  
Anesthesiologist  
Anesthesia Associates of New Mexico, P.C.  
1720 Louisiana Blvd NE, Suite 401  
Albuquerque, NM 87110

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,

Andrew Black, MD

**Submitter :** Dr. Michael R. Gruber

**Date:** 07/12/2007

**Organization :** Anesthesia Associates

**Category :** Individual

**Issue Areas/Comments**

GENERAL

GENERAL

See Attachment

CMS-1385-P-1882-Attach-1.TXT

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.

Michael R. Gruber MD  
Anesthesia Associates  
104 West 5<sup>th</sup> Avenue  
Spokane, WA 99204

**Submitter :** Dr. Cameron Burrup  
**Organization :** Anesthesia Associates of New Mexico, P.C.  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

GENERAL

See Attachment

CMS-1385-P-1883-Attach-1.DOC



July 12, 2007

Cameron Burrup, MD.  
Anesthesiologist  
Anesthesia Associates of New Mexico, P.C.  
1720 Louisiana Blvd NE, Suite 401  
Albuquerque, NM 87110

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

**Submitter :** Dr. Johnny Brian  
**Organization :** Dr. Johnny Brian  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**Background**

**Background**

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,  
Johnny E. Brian, Jr., M.D.

**Submitter :** Dr. John Strohm  
**Organization :** Madison Anesthesiology Consultants  
**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  
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Thank you for your consideration of this serious matter.

**Submitter :** Dr. David Boswell  
**Organization :** TTUHSC Dept. of Anesthesiology  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

GENERAL

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

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Thank you for your consideration of this serious matter.

**Submitter :** Dr. Marc Kaufman  
**Organization :** american society of anesthesiologists  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

GENERAL

GENERAL

see attached

**Submitter :** Mrs. Sarah Boswell  
**Organization :** Mrs. Sarah Boswell  
**Category :** Occupational Therapist

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

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

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Thank you for your consideration of this serious matter.

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

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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 J Muehlschlegel

**Submitter :**

**Date:** 07/12/2007

**Organization :**

**Category :** Physician

**Issue Areas/Comments**

**GENERAL**

GENERAL

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

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

Dear Ms. Norwalk:

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Thank you for your consideration of this serious matter.



**Submitter :**

**Date:** 07/12/2007

**Organization :**

**Category :** Physician

**Issue Areas/Comments**

**GENERAL**

GENERAL

we need better funding for our services especially at university centers were we do a high volume of trauma.

**Submitter :** Dr. JEFFREY RUSHEEN  
**Organization :** ASA  
**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  
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Thank you for your consideration of this serious matter.

**Submitter :** Dr. Adam Brown  
**Organization :** University of Michigan  
**Category :** Hospital

**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  
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Thank you for your consideration of this serious matter.

Dr. Adam M. Brown  
Lieutenant, Medical Corps, United States Navy

**Submitter :** Dr. James Lonergan  
**Organization :** CAA,PC anesthesia dept.  
**Category :** Physician

**Date:** 07/12/2007

**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  
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Thank you for your consideration of this serious matter.

**Submitter :** Dr. Hector Lozano  
**Organization :** Dr. Hector Lozano  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

Please consider my support for the proposal to increase anesthesia payments under the 2008 Physician Fee schedules. I appreciate the time you are dedicating to this matter, and am hopeful that we can count on your support to increase our reimbursement. This increase is necessary to take care of our aging population and provide the best care for out patients. Please follow through on this proposal to make it a reality.

**Submitter :** Dr. Steven Zinn  
**Organization :** Capitol Anesthesiology Association  
**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  
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Thank you for your consideration of this serious matter.

Steven Zinn, MD  
20 Nob Hill Circle  
Austin, Texas 78746

**Technical Corrections**

Technical Corrections  
Anesthesia Coding

**Submitter :** Dr. Scott Stevenson

**Date:** 07/12/2007

**Organization :** ASA

**Category :** Physician

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

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

Scott H. Stevenson, MD

**Submitter :** Scott Reineck  
**Organization :** Scott Reineck  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

As an anesthesiologist, I am very frustrated by the low reimbursement from medicare. Medicare patients are some of the sickist, and in most need of our skill. Though I have only in practice for 15 years, I continue to think of changing careers mainly because of the growing discrepancy in medicare payment and the value I bring to the patient. The proposed payment increase is a small step in the right direction. All physicians are feeling the effects of the medicare cuts, but the value given for anesthesiologists in San Diego county is humiliating. We are negatively affected by the low value for anesthesia services as well as the low value for San Diego County! San Diego is the 7th largest city in the country, and one of the most expensive places to live, yet we are given the same reimbursement as rural counties! In any case, I urge you to accept the proposed increase if you hope to have any anesthesia providers for medicare patients practicing in San Diego.



**Submitter :** Dr. Gary Isley  
**Organization :** American Society of Anesthesiologists  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

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Thank you for your consideration of this serious matter.

**Submitter :** Dr. Josiah Tilton  
**Organization :** Dr. Josiah Tilton  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

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. James Griffin

**Date:** 07/12/2007

**Organization :** Dr. James Griffin

**Category :** Physician

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

I am writing in support of the proposed increase by RUC in anesthesia payments under the 2008 fee schedule. This will address a long-standing undervaluation of anesthesia care related to the institution of the RBRVS. I feel this is essential to ensure quality anesthesia care access to our citizens that are most vulnerable and in most need of these services. Thank you.

**Submitter :** Dr. David Mareth

**Date:** 07/12/2007

**Organization :** UTMB

**Category :** Physician

**Issue Areas/Comments**

**GENERAL**

GENERAL

Re: CMS-1385-P

Anesthesia Coding (Part of 5-Year Review)

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Thank you for your consideration of this serious matter.

**Submitter :** Dr. michael nguyen  
**Organization :** Dr. michael nguyen  
**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

Rc: 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. Roger Williams

**Date:** 07/12/2007

**Organization :** University of Texas Medical Branch

**Category :** Physician

**Issue Areas/Comments**

**GENERAL**

GENERAL

Dear Ms. Norwalk,

I am writing in support of the proposal to increase anesthesia payments under the 2008 Physician Fee Schedule. As an anesthesiology resident, it disturbs me how little the general public knows about their Anesthesiology care when they undergo surgery. I know that I was ignorant of how important an Anesthesiologist can be to patient health and safety. It also astounds me at how little other medical professionals know about our jobs.

In conclusion, please consider the increase in Medicare payments for anesthesiology services the utmost of importance for the improved care of our seniors.

Sincerely,

Roger Williams, MD

**Submitter :** Dr. Brian Woodcock  
**Organization :** University of Michigan  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

GENERAL

See attachment

CMS-1385-P-1905-Attach-1.DOC

# 1905



Brian Woodcock, MB ChB, MRCP, FRCA, FCCM  
Clinical Assistant Professor  
Director of Medical Student Education

Department of Anesthesiology  
4172 Cardiovascular Center  
1500 East Medical Center Drive, SPC 5861  
Ann Arbor, Michigan 48109-5861

Telephone: 734.936.4280  
Fax: 734.232.4548

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  
Anesthesia Coding (Part of 5-Year Review)**

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Thank you for your consideration of this important matter.

Yours Sincerely,

*Brian Woodcock*

Brian Woodcock, MB ChB, MRCP, FRCA, FCCM  
Clinical Assistant Professor  
Director of Medical Student Education  
Department of Anesthesiology



**Submitter :** Dr. Michael Cox  
**Organization :** Anesthesia Medical Group of Santa Barbara, Inc.  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

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

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

Leslie V. Norwalk, Esq.  
Acting Administrator  
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Attention: CMS-1385-P  
P.O. Box 8018  
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Thank you for your consideration of this serious matter.

Michael Cox, M.D.  
American Board of Anesthesiology diplomate

CMS-1385-P-1906-Attach-1.DOC

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Acting Administrator  
Centers for Medicare and Medicaid Services  
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Michael Cox, M.D.  
American Board of Anesthesiology diplomate

**Submitter :** Afshin Shabanie  
**Organization :** St Joseph Hospital  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

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

Afshin Shabanie, M.D  
St Joseph Hospital  
Orange, CA , 92868

**Submitter :** Dr. John Masiello  
**Organization :** Dr. John Masiello  
**Category :** Individual

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

Leslie V. Norwalk, Esq.  
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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:

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.

John Masiello, M.D.

**Submitter :** Dr. Michael Hoger  
**Organization :** CAS  
**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  
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Thank you for your consideration of this serious matter.

Sincerely;

Michael W. Hoger, D.O.

**Submitter :** Dr. richard rutgers  
**Organization :** Dr. richard rutgers  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

GENERAL

Dear Sir or Madam: Thank you for recognizing the long-standing discrepancy in Medicare reimbursement to Anesthesiologists. Please approve the rate increase and continue to fund the use of this uniquely American invention in Medicare patients. Sincerely, Richard Rutgers, M.D.

**Submitter :** Dr. Douglas Cleveland  
**Organization :** Park Ridge Anesthesiology Assoc./ASA  
**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

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Thank you for your consideration of this serious matter.

**Submitter :** Dr. Donald Silverman  
**Organization :** American Society of Anesthesiology  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

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



**Submitter :** Dr. Patrick Fall  
**Organization :** Anesthesia Associates of Abington, Ltd.  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

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

Payment For Procedures And Services Provided In ASCs

Care is more efficient at outpatient centers and should be reimbursed at a rate that encourages their continued growth.

**Submitter :** Dr. Patrick Fall

**Date:** 07/12/2007

**Organization :** Anesthesia Associates of Abington, Ltd.

**Category :** Physician

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

Anesthesia services are costly and require significant resources. Due in part to the national shortage of anesthesiologists, physicians will move from areas of high medicare populations to ones with less medicare patients because of the relatively low rate of medicare reimbursement. An increase is overdue and needs to be instituted ASAP in order to fairly compensate our highly trained profession.

**Submitter :** Dr. Dorothy Penaloza  
**Organization :** Virginia Mason Medical Center  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

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

Payment For Procedures And Services Provided In ASCs  
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.  
Dr. Dorothy Ann Penaloza

**Submitter :** Dr. James Winkley

**Date:** 07/12/2007

**Organization :** Dr. James Winkley

**Category :** Physician

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

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Thank you for your time

James V. Winkley MD

**Submitter :** Dr. Amir Baluch  
**Organization :** University of Miami Miller School of Medicine  
**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  
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Thank you for your consideration of this serious matter.

Dr. Amir R. Baluch, MD  
Anesthesiology Resident  
University of Miami Miller School of Medicine/Jackson Memorial Hospital  
Miami, FL 33136

**Submitter :** Dr. Jonathon Gruneich  
**Organization :** Bellevue Anesthesia Associates  
**Category :** Physician

**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  
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Thank you for your consideration of this serious matter.

**Submitter :** Dr. Paul Johnson

**Date:** 07/12/2007

**Organization :** ACMG, PC

**Category :** Physician

**Issue Areas/Comments**

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

Coding-- Additional Codes From 5-Year Review

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

Paul W. Johnson, M.D.  
Dothan, AL 36305

**Submitter :** Dr. Chakrapol Lattanand  
**Organization :** Washington University Department of Anesthesiology  
**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  
Anesthesia Coding (Part of 5-Year Review)  
Please see attachment.

CMS-1385-P-1920-Attach-1.RTF



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

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

Chakrapol Lattanand M.D.  
Assistant Professor  
Washington University Department of Anesthesiology  
Director of the Division of Anesthesiology  
Progress West Healthcare Medical Center, O'Fallon, Missouri

**Submitter :** Dr. Dale Zeh  
**Organization :** Dr. Dale Zeh  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

GENERAL

See attachment

CMS-1385-P-1921-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

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Thank you for your consideration of this serious matter.

**Submitter :** Dr. Lee Balaklaw

**Date:** 07/12/2007

**Organization :** Dr. Lee Balaklaw

**Category :** Physician

**Issue Areas/Comments**

**Resource-Based PE RVUs**

Resource-Based PE RVUs

The fee increase for anesthesia is essential if rural anesthesiologists are to survive in practice versus abandoning the patients for more economically viable areas. The cost of practice is rising faster than Medicare's tiny increases jeopardizing my and many other rural anesthesiologists practices.

**Submitter :** Dr. Blair Smith

**Date:** 07/12/2007

**Organization :** ASA

**Category :** Physician

**Issue Areas/Comments**

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

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

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

**Submitter :** Dr. Brian Durkin  
**Organization :** Stony Brook University  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

Please increase reimbursement for medicare anesthesiology services.

**Submitter :** Dr. S. Wynn Dean III

**Date:** 07/12/2007

**Organization :** ASA

**Category :** Physician

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

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

**Submitter :** Dr. William Daly  
**Organization :** none  
**Category :** Health Care Professional or Association

**Date:** 07/12/2007

**Issue Areas/Comments**

**Resource-Based PE RVUs**

Resource-Based PE RVUs

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Acting Administrator  
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**Submitter :** Dr. William Daly  
**Organization :** none  
**Category :** Health Care Professional or Association

**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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Acting Administrator  
Centers for Medicare and Medicaid Services  
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**Submitter :** Dr. Philip Sissons  
**Organization :** Anesthesia Associates of Gadsden Alabama  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

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Acting Administrator  
Centers for Medicare and Medicaid Services  
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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.

Philip L Sissons, MD  
philster\_s@comcast.net

**Submitter :** Syed Rizvi  
**Organization :** Syed Rizvi  
**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:

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.

**Submitter :** Dr. Ernest Hayward  
**Organization :** California Anesthesia Associates  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

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

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

I support the increase (\$4.00/unit) in proposed reimbursement for Medicare Payments to Anesthesiologists. Our elderly population lives longer, has more complicated medical problems and presents higher risks for treatment and therapeutic intervention. Thank you.

**Submitter :** Dr. Lance Kekoler

**Date:** 07/12/2007

**Organization :** Dr. Lance Kekoler

**Category :** Physician

**Issue Areas/Comments**

**Resource-Based PE RVUs**

**Resource-Based PE RVUs**

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

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

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Thank you for your consideration of this serious matter.

Lance Kekoler

**Submitter :** Dr. Eric White  
**Organization :** Capitol Anesthesiology Association  
**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  
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Thank you for your consideration of this serious matter.

Eric White, M.D.

Submitter :

Date: 07/12/2007

Organization :

Category : Physician

Issue Areas/Comments

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

Coding-- Additional Codes From 5-Year Review

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

Archana Raghavan

**Submitter :** Dr. Steve Sperring  
**Organization :** Dr. Steve Sperring  
**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.

Steven J Sperring MD

CMS-1385-P-1934-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.

Steven J Sperring MD

**Submitter :** Dr. Mark Staudacher  
**Organization :** Dr. Mark Staudacher  
**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  
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Thank you for your consideration of this serious matter.

Sincerely,  
Mark A. Staudacher, MD  
Elburn, IL

**Submitter :** Dr. Neera Tewari  
**Organization :** Dr. Neera Tewari  
**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 :** Dr. Ira Landsman  
**Organization :** Vanderbilt University  
**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.

Ira Landsman MD

**Submitter :** Dr. Craig Bohnhoff  
**Organization :** Advanced Anesthesia Associates  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

GENERAL

See Attachment

**Submitter :** Dr. David Friedman

**Date:** 07/12/2007

**Organization :** Dr. David Friedman

**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. Joe Jackson  
**Organization :** Baylor College of Medicine  
**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:

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

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Thank you for your consideration of this serious matter.

Sincerely,

Joe Jackson, M.D.  
Anesthesiology Resident  
Baylor College of Medicine  
joehjackson@hotmail.com

**Submitter :** Dr. Lena Mayes  
**Organization :** American Society of Anesthesiology  
**Category :** Individual

**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

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Thank you for your consideration of this serious matter.

Lena Mayes, MD  
Staff Anesthesiologist  
Maryland



**Submitter :** Bradley Richards  
**Organization :** Bradley Richards  
**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  
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Thank you for your consideration of this serious matter.

Submitter : Dr. Jael Carbajal

Date: 07/12/2007

Organization : Dr. Jael Carbajal

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.

Sincerely,  
Jael G. Carbajal, M.D.  
Associate Professor of Anesthesiology  
University of Texas Health Science Center at Houston Medical School  
Department of Anesthesiology and Critical Care

**Submitter :** Dr. Ryan Braun

**Date:** 07/12/2007

**Organization :** Dr. Ryan Braun

**Category :** Physician

**Issue Areas/Comments**

**GENERAL**

**GENERAL**

I strongly support the American Society of Anesthesiologist's position on CMS payment reform for Anesthesiologist. They have unfairly targeted our specialty for consistent payment cuts. I urge you to vote in favor of the proposed reform.

**Submitter :** Dr. Ben Julian Palanca  
**Organization :** Barnes Jewish Hospital  
**Category :** Physician

**Date:** 07/12/2007

**Issue Areas/Comments**

**GENERAL**

GENERAL

Please see attached letter.

CMS-1385-P-1945-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,  
Ben Julian Palanca, M.D., Ph.D.  
Resident, Anesthesiology and Critical Care  
Barnes Jewish Hospital  
St. Louis, Missouri

**Submitter :** Mrs. Roberta Rodriguez  
**Organization :** Mrs. Roberta Rodriguez  
**Category :** Individual

**Date:** 07/12/2007

**Issue Areas/Comments**

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

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

Payment for these procedures is vital in order to free hospital beds and medical personnel for some of the less complex procedures. The ease of going to a facility that specializes in ambulatory patient procedures is less frightening and more conducive for all concerned. The patient is at greater ease and the personnel are more adept at handling these patients.

Sincerely,  
Roberta D. Rodriguez

**Submitter :** Dr. Robert Isaak  
**Organization :** Vanderbilt University  
**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:

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. Elias Chua  
**Organization :** Anesthesia Services, PA  
**Category :** Physician

**Date:** 07/12/2007

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Organization :

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Peter Nose, M.D., Ph.D.  
Los Gatos, California

**Submitter :** Dr. Sachin Mittal

**Date:** 07/12/2007

**Organization :** Christ Hospital

**Category :** Physician

**Issue Areas/Comments**

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