

Submitter : Dr. Asokumar buvanendran
Organization : Rush University medical center
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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

Dear Ms. Norwalk:

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

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

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

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

Thank you for your consideration of this serious matter.

Submitter :

Date: 07/11/2007

Organization :

Category : Physician

Issue Areas/Comments

GENERAL

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Thank you for your consideration of this serious matter.

Submitter : Mr. KimTam Vaugeois
Organization : American Society of Anesthesiologists
Category : Academic

Date: 07/11/2007

Issue Areas/Comments

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

Coding-- Additional Codes From 5-Year Review

Leslie V. Norwalk, Esq.

Acting Administrator

Centers for Medicare and Medicaid Services

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P.O. Box 8018

Baltimore, MD 21244-8018

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Thank you for your consideration of this serious matter.

Mr. KimTam Vaugeois, MS-IV
New York College of Osteopathic Medicine

Submitter : Mrs. Doris Hollifield
Organization : Asheville Anesthesia
Category : Individual

Date: 07/11/2007

Issue Areas/Comments

Payment For Procedures And Services Provided In ASCs

Payment For Procedures And Services Provided In ASCs

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.

Doris Hollifield

Submitter : Dr. david rosen

Date: 07/11/2007

Organization : praal

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

Please, realize a crisis is brewing if the fee schedules are not improved immediately thank you
david rosen MD

Submitter : Dr. Charles DeFrancesco
Organization : CAD MD
Category : Health Care Professional or Association

Date: 07/11/2007

Issue Areas/Comments

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Payment For Procedures And Services Provided In ASCs

Leslie V. Norwalk, Esq.
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Attention: CMS-1385-P
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Dear Ms. Norwalk:

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Thank you for your consideration of this serious matter.

Charles A. DeFrancesco, M.D.

Submitter : Dr. Jeffrey D. Shapiro
Organization : Georgia Perioperative Consultants
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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Submitter : Dr. Kamala Wright
Organization : Metropolitan Anesthesia PC
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Medicare Economic Index (MEI)

Medicare Economic Index (MEI)

Revisions to Payment Policies Under the Physician Fee Schedule, and Other Part B Payment Policies; Revisions to Payment Policies for Ambulance Services for CY 2008;

Submitter : Dr. Nabil Horani
Organization : Dr. Nabil Horani
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

I support Docket CMS-1385-P,revision to Phycician Fee Schedule

Submitter : Dr. Kamala Wright
Organization : Metropolitan Anesthesia PC
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Medicare Economic Index (MEI)

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Leslie V. Norwalk, Esq.
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Thank you for your consideration of this serious matter.

Submitter : Dr. John Fishburne
Organization : American Association of Anesthesiologists
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Resource-Based PE RVUs

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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.

Submitter : Dr. Daniel Grange
Organization : Mayo Clinic
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

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Thank you for your consideration of this serious matter.

Sincerely,
Daniel L. Grange, D.O.

Submitter : Dr. Gary Robelen
Organization : CAP Anesthesia, P.C.
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

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

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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Michael J. Rosenfeld, MD

Submitter : Dr. Donald Cornutt
Organization : Georgia Perioperative Consultants
Category : Physician

Date: 07/11/2007

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Thank you for your consideration of this serious matter.

Donald R Cornutt Jr MD
Anesthesiologist

Submitter : Dr. William Gitchell
Organization : Tallgrass Anesthesiology Associates
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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Acting Administrator
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Submitter : Dr. R. Dennis Porch
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

I am a retired Anesthesiologist and want to speak in favor of increased fee structure for my former profession. The importance of good people in Anesthesia can not be over stressed. I have seen many excellent physicians abandon their profession because of lack of REASONABLE payment for services. I retired because of injury but feel that had I continued in the profession that I would not have had adequate reimbursement for my services to severely injured people in the trauma center where I worked. I also worked as a pain consultant for cancer patients requiring a lot of care. A society that is unwilling to care well for its sick and very young is not thinking over its priorities properly. This will lead not only to further breakdown of the Medical System but to Society in general. R. Dennis Porch, MD

Submitter : Dr. HERSCHEL KOTKES
Organization : Dr. HERSCHEL KOTKES
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

cms 1385-P PLEASE INCREASE ANESTHESIA UNIT REIMBURSEMENT, WE NEED IT

Submitter : Dr. Sukumar Desai
Organization : Brigham and Women's Hospital, Boston
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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Submitter : Dr. Charles Campbell

Date: 07/11/2007

Organization : ASA

Category : Physician

Issue Areas/Comments

Physician Scacity Areas

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Acting Administrator
Centers for Medicare and Medicaid Services
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Submitter : Dr. Paul Kuzma

Date: 07/11/2007

Organization : Dr. Paul Kuzma

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

RE: Anesthesia Coding Increase

I am writing to strongly support the proposed increase in anesthesia reimbursement. The current level of reimbursement makes it financially difficult for many anesthesiologists to care for Medicare beneficiaries.

The increase in reimbursement will go a long way to assuring that Medicare recipients will continue to have access to anesthesiology services.

Again, I strongly support this initiative.

Sincerely,

Paul Kuzma, MD

Submitter : Mrs. Cathy Nichols

Date: 07/11/2007

Organization : MedOasis

Category : Health Care Professional or Association

Issue Areas/Comments

GENERAL

GENERAL

Please increase the reimbursement rates for Anesthesia services. The rates right now don't even cover the Doctor's cost.

Submitter : Dr. Leighton Smith
Organization : Newport Harbor Anesthesia Consultants
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

See attachment

CMS-1385-P-673-Attach-1.DOC

#673

Leslie V. Norwalk, Esq.
Acting Administrator
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Thank you for your consideration of this serious matter.

Leighton J. Smith M.D.

Submitter : Dr. Ronald Harter
Organization : Ohio State University
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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

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Thank you for your consideration of this serious matter.

Submitter : Dr. Robert Foege
Organization : Beth Israel Deaconess Medical Center
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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

Sincerely,

Robert C Foege, MD

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

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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

Submitter : Dr. John Allyn
Organization : Maine Medical Center
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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

John Allyn, M.D.
Chief, Department of Anesthesiology and Pain Management
Maine Medical Center
Portland, ME

Submitter : Dr. william johnston

Date: 07/11/2007

Organization : scott

Category : Physician

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
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Baltimore, MD 21244-8018

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Thank you for your consideration of this serious matter.

Submitter : Dr. Wilton Levine
Organization : Massachusetts General Hospital
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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

Submitter : Dr. Samuel Fenner

Date: 07/11/2007

Organization : Dr. Samuel Fenner

Category : Physician

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)

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Thank you for your consideration of this serious matter.

Submitter : Dr. James Rosher

Date: 07/11/2007

Organization : OAS,LLC

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

Please support this so that Medicare aged individuals continue to get superior care from the best physicians in the area of anesthesiology. Our rates are way below the acceptable range in the Kansas City area. Thanks for your support and consideration of this very important step to make Medicare reimbursement acceptable.
Sincerely, James W. Rosher MD

Submitter : Dr. Sandra Kopp

Date: 07/11/2007

Organization : Mayo Clinic

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

see attachment

CMS-1385-P-682-Attach-1.DOC

A1682

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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Sincerely,

Sandra L. Kopp, M.D.
Anesthesiologist

Submitter : Dr. Gurinder Vasdev
Organization : Mayo Clinic College of Medicine
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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

Submitter : Dr. Maria Zestos
Organization : Detroit Medical Center
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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Thank you for your consideration of this serious matter.

Submitter : Dr. Peter Anderson
Organization : Dr. Peter Anderson
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

Please increase payments for anesthesiologists. We have been affected by reduced pay more than any other specialty. This will affect recruiting of medical students to the specialty and in fact has reduced academic anesthesia because of the reduced pay. We have made such great strides in safety and great care. Please do not punish our success. Please increase medicare reimbursements for anesthesia.

Thank you,
Pete Anderson

Malpractice

Malpractice

Tort reform on a national level is greatly needed for Medicine in general but especially Anesthesia. The cost is a great reason for the increase in the cost of medicine. Arbitration and handling frivolous lawsuits is especially needed. It is estimated that up to 40 percent of lawsuits are frivolous for instance.

Submitter : Dr. Ronald Smith

Date: 07/11/2007

Organization : Florida Ambulatory Anesthesia, L.L.C.

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

This increase is essential to be able to maintain the ability to hire skilled professionals that can deliver the highest quality care that the American public deserves.

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

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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

Submitter : Dr. jacob israel
Organization : member NYSSA
Category : Individual

Date: 07/11/2007

Issue Areas/Comments

Background

Background

I am an 81 year old physician who has spent his entire medical life as an academician. I have worked in Depts in the SUNY system for 20 years, I have also served in the USN during WWII, only in V-12 program and as a corpsman at USNH Brooklyn. Then I was called to active duty during the Korean conflict where I served with the US Army as a medical officer in the 4052 ASU at Fort Bliss Texas as an interim assignment. I then was reassigned to the Navy where I served at various bases and hospitals. I resigned my commission in 1950's and I rejoined the USNR again in 1989 to start a training unit for Drs. and nurses. I was called to active duty during Desert storm, only in this country.

Between 1950's and today I have served in the capacity as a clinician and a Professor of Anesthesiology in Medical schools @SUNY, Columbia Univ Hospital, NYC as well as @ Albert Einstein College of Medicine, Mt. Sionai School of Medicine and NYU College of Medicine.

It is important for the care of patients to have physicians teaching and working with trainees to continue the training and care process for our patients so they will continue to get the quality of care that we in organized Medicine have dedicated our life's work.

I retired as a physician doing operating room work at the age of 70 and am working seeing patients in a preoperative clinic to help provide the care necessary to help make the operating room experience a safer experience with an added safety net for our patients'.

Having financial support for our teachers is imperative to continue the training process for quality medical care.

Submitter : Dr. Scott Reeves
Organization : Medical University of South Carolina
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

Dear Sir,

As the chairman of the Department of Anesthesia & Perioperative Medicine at the Medical University of South Carolina in Charleston, South Carolina, I am writing to request that CMS increases the Medicare anesthesia conversion factor under rule CMS-1385-P. My department trains both anesthesiologist resident MDs and nurse anesthesia students. The extremely low anesthesia conversion factor significantly affects the ability of my department to staff our facility. Last year alone the department lost over \$350,000 due to low Medicare rates. This increase will significantly improve the poor conversion rates compared to other specialties.

Sincerely,

Scott T. Reeves, MD

Submitter : Dr. Steven Hall
Organization : Children's Memorial Hospital
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

Dr. Steven Hall

Submitter : Dr. Brian Ribak
Organization : St. John Anesthesia Services, Inc.
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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

Brian Ribak, M.D.
3516 E. 60th Street
Tulsa, OK 74135

Submitter : Dr. Christopher Gharibo
Organization : NYU Medical Center
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

ASP Issues

ASP Issues

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
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CMS-1385-P-692-Attach-1.WPD

CMS-1385-P-692-Attach-2.DOC

692

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.

Thank you for your consideration of this serious matter.

Submitter : Dr. Peter Goldstein
Organization : NewYork-Presbyterian Hosp. - Weill Cornell
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

see attached file

CMS-1385-P-693-Attach-1.PDF

#693



Weill Cornell Medical College

New York-Presbyterian Hospital
Weill Cornell Medical Center

Peter A. Goldstein, M.D.
Associate Professor
Associate Anesthesiologist
Department of Anesthesiology
525 East 68th Street, A-1050
New York, NY 10065-4879

Email: pag2014@med.cornell.edu
Telephone: 212 746-5325
Fax: 212 746-4879

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

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

Dear Ms. Norwalk:

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

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Thank you for your consideration of this serious matter.

Sincerely yours,

Peter A. Goldstein, MD
Associate Professor of Anesthesiology

Submitter :

Date: 07/11/2007

Organization : East Carolina Anesthesia Associates, PLLC

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

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

Submitter : Dr. Adam Goldstein
Organization : William W. Backus Hospital
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

Dear Madam or Sir, I implore you to review and change the current improper treatment of anesthesia by CMS. There is a shortage of anesthesia providers in this country. Medicare patients will not be able to receive proper care with the ongoing payment rates. Please help our elderly continue to receive the quality anesthesia services that they deserve. Respectfully, Adam Goldstein, MD

Submitter : Dr. Lucy Weston

Date: 07/11/2007

Organization : Dr. Lucy Weston

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 Loushin
Organization : Dr. Michael Loushin
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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

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

Thank you for your consideration of this serious matter.

Sincerely,

Michael Loushin, MD

Submitter : Dr. Bruce Chipkin

Date: 07/11/2007

Organization : NAPA

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.

Submitter : Dr. Waqqas Khan
Organization : Southern IL Anesthesiology
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

I am writing about proposed increases for Anesthesia services. It is high time some increases were adopted, because we are fast approaching a point where, because of stagnant payments, and increased non-funded mandatory regulation, a mass opt-out from providing services to CMS patients becomes an attractive option.

Submitter : Dr. Wallace Hayasaka
Organization : Physician Anesthesia Services
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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

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Thank you for your consideration of this serious matter.

CMS-1385-P-700-Attach-1.PDF

CMS-1385-P-700-Attach-2.DOC

#700

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

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

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Thank you for your consideration of this serious matter.

CMS-1385-P-701

Submitter : Dr. William Kirk

Date: 07/11/2007

Organization : Dr. William Kirk

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

Sec Attachment

CMS-1385-P-701-Attach-1.DOC

701

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

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

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Thank you for your consideration of this serious matter.

William Kirk, M.D.

Submitter : Dr. Dana Brock

Date: 07/11/2007

Organization : Wishard Anesthesia Group, Indiana Society of Anest

Category : Physician

Issue Areas/Comments

Background

Background

Increase in anesthesia payments is an absolute necessity to ensure the health of academic anesthesia programs who already suffer decreased compensation from CMS due to the teaching rule.

Submitter : Dr. Daniel Kennedy
Organization : Dr. Daniel Kennedy
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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

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Thank you for your consideration of this serious matter.

Submitter : Dr. Joel Smith

Date: 07/11/2007

Organization : N/A

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-704-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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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.

As I have just now graduated from Residency and have joined a small group of anesthesiologists in a community hospital, this issue could have great impact on the availability of services at such hospitals. I am looking forward to a long, productive, and compassionate career.

Thank you for your consideration of this serious matter.

Joel D Smith, DO

Submitter : Dr. Rodney Garcia

Date: 07/11/2007

Organization : Memorial Sloan-Kettering Cancer Center

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

Dear Sir/Madam,

With regard to CMS-1385-P. Please move forward to improve access to needed health care for Medicare recipients by passing the recommendations in this proposal.

Thank you in advance,
Rodney Garcia MD

Submitter : Kevin Hall

Date: 07/11/2007

Organization : ASA

Category : Other Health Care Professional

Issue Areas/Comments

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

Payment For Procedures And Services Provided In ASCs

Thank you for your time.

As it relates to CMS payment for anesthesia, they are one of the few specialities that have improved healthcare delivery and safety for surgical patients. Compared to even twenty years ago, anesthesia practiced within the anesthesia care team model as provided excellent, evidence-proven patient care. I only ask that such improvement is not penalized but rewarded accordingly.

Kevin M. Hall, AA-S, PA-C

Submitter : Dr. Dana Brock
Organization : Indiana Society of Anesthesiologists
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Background

Background

See attached letter

CMS-1385-P-707-Attach-1.DOC

#707

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. Paul Martin
Organization : Dr. Paul Martin
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

See Attached File

CMS-1385-P-708-Attach-1.DOC

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

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

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Thank you for your consideration of this serious matter.

Submitter : Dr. James Hebl
Organization : Mayo Clinic
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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

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Thank you for your consideration of this serious matter.

Sincerely,
James R. Hebl, M.D.

Submitter : Andrew Moukabary
Organization : Andrew Moukabary
Category : Individual

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

I am in favor of raising payment for anesthesia sevicees

CMS-1385-P-711

Submitter : Dr. Marilyn Larach
Organization : Dr. Marilyn Larach
Category : Individual

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-1385-P-711-Attach-1.DOC

3005 Susanne Court
Owings Mills, MD 21117
July 11, 2007

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

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

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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.

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

Thank you for your consideration of this serious matter.

Sincerely yours,

Marilyn Green Larach M.D.

Marilyn Green Larach M.D.
Associate Professor of Anesthesiology
Penn State College of Medicine

Submitter : Dr. Dean Sider
Organization : Dr. Dean Sider
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

Re: CMS-1385-P
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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. Stated more clearly, after paying our overhead, we currently lose money on every Medicare case. Obviously, this is an unsustainable business formula.

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.

Dean Sider, M.D.
Longwood, FL

Submitter : Dr. mukesh nigam
Organization : danville anesthesiologists inc
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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 : Dr. Bruce Kaufman
Organization : OPM-LLC
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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Thank you for your consideration of this serious matter.

Submitter : Dr. Jay Shapiro
Organization : VCU Health Systems/MCV
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Payment For Procedures And Services Provided In ASCs

Payment For Procedures And Services Provided In ASCs

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Thank you for your consideration of this serious matter.

Submitter : Jay E. Krauss, Jr. MD
Organization : St. Cloud Surgical Center
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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Jay E Krauss Jr MD

Submitter : Julius Mapalad
Organization : Julius Mapalad
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Medicare Economic Index (MEI)

Medicare Economic Index (MEI)

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

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Thank you for your consideration of this serious matter.

CMS-1385-P-717-Attach-1.DOC

#717.

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. Ralph Glasser

Date: 07/11/2007

Organization : Dr. Ralph Glasser

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.

Ralph Glasser MD
Professor of Anesthesiology
Southern Illinois University
School of Medicine

Submitter : Dr. Richard Rivers
Organization : Johns Hopkins University
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Resource-Based PE RVUs

Resource-Based PE RVUs

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

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

Sincerely your,

Richard Rivers, M.D., Ph.D.
Associate Professor
Johns Hopkins University

Submitter : Dr. Barbara Ryan
Organization : Spectrum Medical Group
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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

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Barbara A Ryan, MD
Maine Medical Center Department of Anesthesiology and Pain Management
22 Bramhall St.
Portland, ME 04102-3175

Submitter : Dr. Alan Marco

Date: 07/11/2007

Organization : Dr. Alan Marco

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.

Submitter : Dr. Mark Davidson
Organization : Dr. Mark Davidson
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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

Submitter : Dr. Kurt Jones
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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

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

Thank you for your consideration of this serious matter.

Submitter : Dr. Angela Edwards
Organization : Wake Forest University Department of Anesthesiolog
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

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

Coding-- Additional Codes From 5-Year Review

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

Re: CMS-1385-P
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To ensure that our patients have access to expert anesthesiology medical care, especially our seniors, it is imperative that CMS follow through with the proposal in the Federal Register by fully and immediately implementing the anesthesia conversion factor increase as recommended by the RUC. This change will have a profound effect in how we are able to provide care in the future for our increasing aged population.

Thank you for your consideration of this serious matter. I would welcome the opportunity to discuss this with you in person. Please feel free to contact me any time at your convenience.

Sincerely,

Angela F. Edwards, MD
Assistant Professor, Department of Anesthesiology
Wake Forest University School of Medicine
afedward@wfubmc.edu

Submitter : Dr. martin nitsun
Organization : Evanston Northwestern Healthcare
Category : Physician

Date: 07/11/2007

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.

Submitter : Dr. Guy Weinberg
Organization : University of Illinois
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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

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Anesthesia Coding (Part of 5-Year Review)

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Guy Weinberg, MD

Submitter : Dr. SteveN J Hattamer
Organization : Nashua Anesthesia Partners
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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

Sincerely,

Steven J. Hattamer, M.D.
Chairman
Department of Anesthesiology and Perioperative Medicine
Southern New Hampshire Medical Center
Nashua, New Hampshire 03060
Office - 603-889-2624
Cell - 603-234-0000

CMS-1385-P-727-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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Steven J. Hattamer, M.D.
Chairman
Department of Anesthesiology and Perioperative Medicine

Southern New Hampshire Medical Center
Nashua, New Hampshire 03060
Office - 603-889-2624
Cell - 603-234-0000

Submitter : Dr. Kip Robinson

Date: 07/11/2007

Organization : Dr. Kip Robinson

Category : Physician

Issue Areas/Comments

GENERAL

GENERAL

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

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

Dear Ms. Norwalk:

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

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

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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.

Kip D. Robinson, MD

Submitter : Dr. Eugene Betts
Organization : Medical College of Georgia
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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Acting Administrator
Centers for Medicare and Medicaid Services
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Submitter : Dr. Leila Welborn
Organization : Childrens National Medical Center Washington DC
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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Acting Administrator
Centers for Medicare and Medicaid Services
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Leila G. Welborn, M.D.
Professor of Anesthesiology & Pediatrics
George Washington University Medical Center
Medical Director Ambulatory Surgery Center
Children's National Medical Center
111 Michigan Avenue, NW
Washington DC 20010
202-884-5626 @ CNMC
301-838-8764 @ ASC
lwelborn@cnmc.org

Submitter : Dr. Haleh Saadat

Date: 07/11/2007

Organization : Yale

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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Haleh Saadat, MD

Submitter : Dr. Sipong Prakalapakorn
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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Sincerely,
S. Greg Prakalapakorn, MD
Department of Anesthesiology
Santa Clara Medical Center

Submitter : Dr. Ronak Desai
Organization : Dr. Ronak Desai
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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Submitter : Dr. christopher lee

Date: 07/11/2007

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

P.O. Box 8018

Baltimore, MD 21244-8018

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Thank you for your consideration of this serious matter.

Sincerely Yours,
Christopher Lee, M.D.

CMS-1385-P-734-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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Anesthesia Coding (Part of 5-Year Review)**

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Submitter : Dr. Coleman Floyd

Date: 07/11/2007

Organization : Dr. Coleman Floyd

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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P.O. Box 8018
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Coleman L. Floyd, MD
cbuckhouse@aol.com
409 Woodvale Dr.
Florence, SC 29501
843-669-9043

Submitter : Dr. carlos campos
Organization : Baylor College of Medicine
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

GENERAL

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 serious matter. consideration of this

Submitter : Dr. Rebecca Chan
Organization : ASA
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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Leslie V. Norwalk, Esq.

Acting Administrator

Centers for Medicare and Medicaid Services

Attention: CMS-1385-P

P.O. Box 8018

Baltimore, MD 21244-8018

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Sincerely,
Rebecca Chan, M.D.

Submitter : Dr. Natalia Ferrando
Organization : ASA
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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Leslie V. Norwalk, Esq.

Acting Administrator

Centers for Medicare and Medicaid Services

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Sincerely,
Natalia Ferrando, M.D.

Submitter : Craig Westwood

Date: 07/11/2007

Organization : Craig Westwood

Category : Physician

Issue Areas/Comments

Impact

Impact

Anesthesiology care is critical to all of our citizens. It must be supported better by Medicare in order to maintain quality today and in the future. Please support better reimbursement in order to have high quality care.

Thank you.

Submitter : Dr. Carl Daltner
Organization : Western Pennsylvania Anesthesia Associates
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Payment For Procedures And Services Provided In ASCs

Payment For Procedures And Services Provided In ASCs

Leslie V. Norwalk, Esq.
Acting Administrator
Centers for Medicare and Medicaid Services
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Submitter : Dr. Jennifer Rasmussen

Date: 07/11/2007

Organization : Dr. Jennifer Rasmussen

Category : Physician

Issue Areas/Comments

Medicare Economic Index (MEI)

Medicare Economic Index (MEI)

See attachment

CMS-1385-P-741-Attach-1.DOC

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

Jennifer Rasmussen, M.D.

Submitter : Lee-lynn Chen
Organization : Lee-lynn Chen
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

GENERAL

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Acting Administrator
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Submitter : Dr. Jack McClarty
Organization : Dr. Jack McClarty
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

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S. Jack McClarty, MD

jackmcclarty@hotmail.com

Submitter : Dr. Robert Weinberg

Date: 07/11/2007

Organization : Dr. Robert Weinberg

Category : Physician

Issue Areas/Comments

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Acting Administrator
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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.

Sincerely,

Robert M. Weinberg, M.D.

Submitter : Dr. Steven Pulley

Date: 07/11/2007

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
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. Alexander DeLeon
Organization : Northwestern University
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

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Submitter : Dr. Henry Cabrera
Organization : Advocate Illinois Masonic Medical Center
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

Payment For Procedures And Services Provided In ASCs

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Submitter : Dr. John siegle

Date: 07/11/2007

Organization : Dr. John siegle

Category : Physician

Issue Areas/Comments

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Sincerely,
John H. Siegle, MD

Submitter : Dr. Leif Dahleen
Organization : American Society of Anesthesiologists
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

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Thank you for your consideration of this serious matter. I am a young, newly board certified anesthesiologist who will be caring for patients for the next 30 years or more.

Sincerely,
Leif Dahleen, M.D.

Submitter : Dr. Andrew Kowal
Organization : The Lahey Clinic
Category : Physician

Date: 07/11/2007

Issue Areas/Comments

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Regards,

Dr Kowal