

From: Lane, Megan A

Sent: Tuesday, December 4, 2018 2:55 PM

To: CHENG Alexander S * DCBS **Subject:** RE: Out of network reimbursement rulemaking proposal filed

Dear Alex,

Thank you for the opportunity to provide additional comment. We appreciate the collaborative approach and look forward to future engagement on this topic. Please see our responses below to requested topics:

- **Geographic adjustments.** We continue to recommend that the final rules use the CMS Geographic Price Cost Index as the method for making geographic adjustments. We feel as though this method is the best approach because it is simpler and easier for insurers to administer and it still takes into account geographic differences so that providers are paid fairly based on their location.
- **CPI adjustments** – We recommend that the final rules adjust from January 2015 to July 2018 as it is the easiest to administer and most accurate as it is based on available data.
- **Base units** – We recommend that the final rules use the CMS CY 2018 Physician Fee Schedule Final Rule as of January 1, 2018 to derive base units.
- **Obstetrical anesthesiology services** – We believe that the proposed rule adequately addresses the reimbursement for obstetrical anesthesiology services and do not recommend any changes at this time.
- **AD modifier** – We recommend that the final rules do not take modifier AD into account for anesthesia-related procedures. The modifiers currently set out in rules accurately reflect current claims adjudication practices.

Please do not hesitate to reach out to me with any questions.

Thank you,

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