Negotiated Rule Making Comments

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Hi Kamerron,

St. Luke's appreciates the opportunity for involvement in negotiated rule making process, reviewing the potential changes our comments are as follows:

- A clear separation between professional, Facility and Critical access rules, the reason behind this, payers/pricing companies are applying professional reduction on our Critical access hospitals.
- Removing Modifiers 80 & 81 currently allowing 25% & 15% would reduce reimbursement to 16% of the physician fee schedule St. Luke's would like this section unchanged.
- RBRVS has reduced allowable payment to our physician by 50%, since Worker Comp requires additional documentation and a specialized services conversion factors dollar amount per CPT ranges should be reviewed since increases having been updated in several years.
- Outpatient physical, occupational and speech are billed on UB form for St. Luke's and we would expect facility pricing and not professional pricing.

 St Luke's®

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