



August 6, 2012

Marilyn Tavenner
Acting Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Hubert H. Humphrey Building
Room 310G
200 Independence Avenue, SW
Washington, DC 20201

Re: CMS-1590-P: Proposed Rule for Revisions to Payment Policies Under the Physician Fee Schedule, DME Face-to-Face Encounters, Elimination of the Requirement for Termination of Non-Random Prepayment Complex Medical Review and Other Revisions to Part B for CY 2013

Dear Acting Administrator Tavenner:

Kidney Care Partners is pleased to have the opportunity to provide the Centers for Medicare and Medicaid Services (CMS) with comments about the Proposed Rule for Payment Policies under the Physician Fee Schedule, DME Face-to-Face Encounters, Elimination of the Requirement for Termination of Non-Random Prepayment Complex Medical Review and Other Revisions to Part B for Calendar Year (CY) 2013 (Proposed Rule). KCP is an alliance of members of the kidney care community that includes patient advocates, dialysis care professionals, providers, and manufacturers organized to advance policies that improve the quality of care for individuals with both chronic kidney disease (CKD) and irreversible kidney failure, known as End Stage Renal Disease (ESRD).¹

We support maintaining individual and group kidney disease education (KDE) program on the list of approved Medicare telehealth services. Coverage of this telehealth service furnished at an originating site, including a practitioner's office and a hospital-based renal dialysis center, ensures that all eligible beneficiaries will have access to educational and counseling services related to the care of chronic kidney disease. Individuals with kidney failure may not always have easy access to dialysis facilities or providers. KDE telehealth services provide patients with the information they need to understand their treatment options and have the tools to manage their disease. Inclusion of KDE as a covered Medicare telehealth service will ensure the continuation of high quality care.

We appreciate the opportunity to share our comments with you. Please do not hesitate to contact Kathy Lester at 202-457-6562 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald Kuerbitz".

Ronald Kuerbitz
Chairman
Kidney Care Partners

¹ A list of members of Kidney Care Partners is included as Attachment A.



Attachment A

Abbott Laboratories
Affymax
American Kidney Fund
American Nephrology Nurses' Association
American Renal Associates, Inc.
American Society of Nephrology
American Society of Pediatric Nephrology
Amgen
Baxter Healthcare Corporation
Board of Nephrology Examiners and Technology
Centers for Dialysis Care
DaVita, Inc.
Dialysis Patient Citizens
DCI, Inc.
Fresenius Medical Care North America
Fresenius Medical Care Renal Therapies Group
Kidney Care Council
Kidney TRUST
Mitsubishi Tanabe Pharma America
National Kidney Foundation
National Renal Administrators Association
Nephrology Nursing Certification Commission
Northwest Kidney Centers
NxStage Medical
Renal Physicians Association
Renal Support Network
Renal Ventures Management, LLC
Sanofi
Satellite Healthcare
Takeda Pharmaceuticals U.S.A (TPUSA)
U.S. Renal Care
Watson Pharma, Inc.