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April 2, 2007

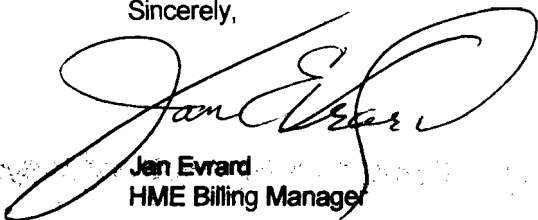
CMS
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development – C
Attention: Bonnie L. Harkless
Room C4-26-05
7500 Security Blvd.
Baltimore, Maryland 21244-1850

Dear Ms Harkless

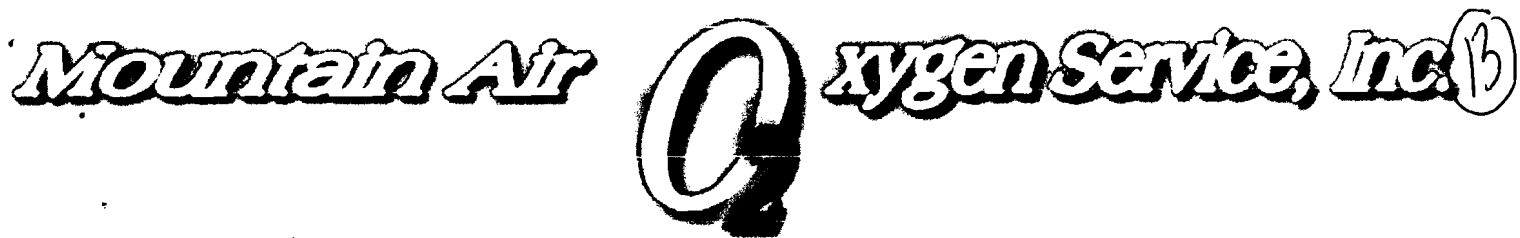
Regarding the proposed revision of Advance Beneficiary Notice of Noncoverage (ABN), Document CMS-R-131:

We have reviewed the proposed revisions to the ABN and appreciate the changes made. The overall layout is much improved. Specifically, the Estimated Cost is now easier to see and being placed with the Item and Reason should enhance beneficiary understanding of this process. Including the option of allowing the beneficiary to pay out of pocket is also a significant improvement.

Sincerely,



Jan Evrard
HME Billing Manager



April 2, 2007

CMS, Office of Strategic Operations and Regulatory Affairs,
Division of Regulations Development – C
Att: Bonnie L. Harkless
Room C4-26-05
7500 Security Blvd.
Baltimore, Maryland 21244-1850

Dear Bonnie:

In accordance with the CMS requests for Public Comment on the Revised Advance Beneficiary Notice (ABN) please review the following comments:

1. Regarding payment for services of oxygen equipment there is stated in the new payment rules that 1 unit equals 15 minutes and 30 minutes is the maximum for a service call. We cover a wide area of a 60 mile radius. This fee doesn't cover fuel or drive time to get to a patient home and back. This only covers if a maintenance performance is done on the equipment itself. Will there be a payment for travel to get to the home or does the patient need to bring their equipment into the store?
2. Since Medicare will no longer cover 6 month repair and maintenance on capped rental DME are we allowed to contact the patient to remind them of service due on their equipment? If we don't call on a regular basis will we be held accountable for not tracking the service and repair maintenance or will the "new owner?" Will there be a catch so that money must be paid back if certain service and maintenance follow-up of some sort is not done?
3. In light of the above will there be a place on the ABN that will allow the supplier to explain these concerns to the patients understanding?

Thank you for considering my comments.

A handwritten signature in cursive script that reads "Susanne Kanen".

Susanne Kanen
President
Medicare # 0736200001



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Division of Regulations Development – C
Attention: Bonnie L. Harkless
Room C4-26-05,
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Baltimore, Maryland 21244-1850

Dear Ms. Harkless:

In response to the opportunity to comment on the proposed revision of the Advanced Beneficiary Form (CMS-R-131), we have the following questions and remarks.

- Can the references in the opening paragraph to “health care provider” be changed to “health care providers”?
 - With the ability of two separate providers to place their names on the form header and represent the professional and technical portions of the service, it may help a beneficiary in recognizing that the ABN is being used jointly.
- In the third bullet point with the mention of billing insurance if options 2 or 3 are chosen, beneficiaries may transfer the intent of this form to the other insurance listed in (H). Can a disclaimer be added in the third bullet point that this form does not apply to any insurance represented in (H)?
 - This will help reinforce that this form only applies to Medicare and eliminate potential confusion between beneficiaries, providers, and third party insurances.
 - Language such as “other insurance is not required to comply with this form” is would augment the statement “though Medicare cannot require us to do [insurance billing]”
- Can a statement be included on the notice about the duration of its effectiveness?
 - For some beneficiaries with repeat services, it important to define whether this applies one time for a particular date of service or if another trigger for expiration would apply. This is important where a beneficiary would desire to revoke the ABN for future services.

Thank you for your consideration of these thoughts. Should you have further need to contact me, I may be reached at (608) 826-2451.

Sincerely,

Carrie Aiken
Compliance Manager
SVA Healthcare Services, LLC