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Submitter Information

Name: Nakul Karkare

Address:

Stony Brook, NY, 11790

Email: office@cortho.org

Phone: 6319812663

General Comment

The MCBS Pulse promises something genuinely valuable: time-sensitive, directional signal from beneficiaries that standard surveys cannot capture. But the utility of that signal depends entirely on what you do with it downstream — and downstream, the data collides with a procedure coding environment built for ambiguity.

Two physicians. Same service. Same documentation. Legitimately different codes. That variance corrupts cross-provider pattern recognition before analysis even begins. Pulse feedback on emerging concerns cannot be acted upon reliably when the procedural data it must inform is inconsistent at the source.

I have developed a deterministic procedure coding standard — free, fully traceable, requiring no physician judgment and no licensing. Every code derives automatically from data already present on the claim. Same service generates the same code, across every provider, every setting, every time. It does not guess. It does not interpret. It produces the stable, uniform substrate that makes rapid-feedback tools like MCBS Pulse genuinely actionable.

The standard is complete and ready. I welcome the opportunity to discuss its relevance to CMS data integrity objectives.

Nakul Karkare, MD

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