

September 26, 2019

VIA ELECTRONIC SUBMISSION

The Honorable Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1715-P
P.O. Box 8016
Baltimore, MD 21244-8016

**Re: CMS-1715-P: Medicare Program; CY 2020 Revisions to Payment Policies
Under the Physician Fee Schedule and Other Changes to Part B Payment Policies**

Dear Administrator Verma:

We appreciate the opportunity to comment on the proposed CY 2020 Medicare Physician Fee Schedule (“PFS”). In the preamble to the proposed rule, CMS stated it would consider comments from stakeholders and invoice submissions regarding potentially misvalued services as part of the rulemaking process.¹ Based on evidence reported in the field, we believe CPT code 36475² may continue to be misvalued and write to bring the circumstance to CMS’s attention. We respectfully request that CMS review the enclosed materials to evaluate CPT 36475 and ensure the practice expense inputs accurately reflect the procedure’s cost.

BACKGROUND

CMS has made several attempts in recent years to correct the fee schedule rate for endovenous ablation procedures. In the CY 2015 PFS proposed rule, CMS identified CPT code 36475 using one of its screening processes as a code that accounted for significant spending under the PFS yet had not been reviewed since CY 2009. As a result, the service underwent a review as potentially misvalued, but only minor adjustments were made to its practice expense (“PE”) inputs.³

In the CY 2019 PFS rulemaking cycle, CMS commissioned a market-based supply update that produced revised estimates of the supply costs associated with a range of services. RF ablation catheters (supply code SD155) are a significant cost input for CPT 36475, and these catheters were included in the market-based supply update. CMS reduced the assigned costs for RF catheters from \$725 to \$550 to reflect more accurate invoice prices observed during the

¹ CMS, Medicare Program; Medicare Program; CY 2020 Revisions to Payment Policies Under the Physician Fee Schedule and Other Changes to Part B Payment Policies, 84 Fed. Reg. 40,482, 40,504, 40,565 (Aug. 14, 2019).

² Descriptor for 36475: Endovenous ablation therapy of incompetent vein, extremity, inclusive of all imaging guidance and monitoring, percutaneous, radiofrequency; first vein treated.

³ CMS, Medicare Program; Revisions to Payment Policies Under the Physician Fee Schedule for CY 2015, 79 Fed. Reg. 40,318, 40,337 (July 11, 2014).

market-based survey. In addition, CMS made the following changes to the costs of other supplies that are individually listed as supply costs in the value of the procedure reported with CPT 36475:

- An increase in costs for the vascular sheaths (supply code SD136) from 2018 cost of \$20.50 to new cost of \$52.80;
- An increase in costs for the hydrophilic guidewire (supply code SD089) from 2018 cost of \$35.50 to \$43.37; and
- A decrease in costs for the RF introducer (supply code SA026) from 2018 cost of \$50 to \$24.16.⁴

Recent evidence from the field, per the attached invoices, suggests the following:

1. When sold individually, the costs of the RF ablation catheter, vascular sheaths, and hydrophilic guidewire are all lower than CMS's estimated costs; and
2. In many cases, if the price of an RF ablation catheters approaches the \$550 estimated by CMS, it is being sold as a kit containing other supplies that are listed (and valued) as separate supplies and expenses in the PE calculation for code 36475.

Attached are invoices and order forms that suggest—based on the two observations above—the current PE calculation may be overvalued for CPT 36475 due to overpriced items and separately paid items that are in fact bundled into a kit priced at the \$550 estimated by CMS (or less). As CMS has recognized, an overvaluation not only constitutes a potential source of waste by the Medicare program, but may also distort medical decision making.

REQUEST TO REVIEW PRACTICE EXPENSE INPUTS FOR CPT 36475

The ten (10) attachments to this letter contain invoices, obtained from end users,⁵ which demonstrate that RF ablation supplies are often purchased at prices substantially lower than the cost inputs taken into account in the market-based supply update. Based on our analysis, these invoices demonstrate that the combined cost of typical RF ablation supplies can be 45% lower than the PE inputs used to calculate payment rates (see **Table 1**):

- Attachment 1 shows the purchase of a single ClosureFast Catheter at a unit price of \$325 rather than \$550;
- Attachment 2 shows an order of Micro Introducer Sheaths of various sizes—all at a unit price of \$20, rather than CMS's estimate of \$52.80;

⁴ See CY 2020 PFS Proposed Rule Market-Based Supply and Equipment Pricing Update, <https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/PhysicianFeeSched/Downloads/CY2019-PFS-FR-Market-Based-Supply.zip>.

⁵ These attachments have been redacted to protect sensitive information.

- Attachment 3 shows an order containing two forms of guidewire (item numbers “GW-025-150-DE1.5J” and “GW-018-45-SS”) priced at \$13.35 and \$14.55 per unit, respectively, rather than CMS’s estimate of \$43.37 per unit.

Table 1. CMS Assigned Costs Compared to Actual Costs of Individual Supplies

<i>Item (CMS PE Code)</i>	<i>CMS Assigned Unit Cost</i>	<i>Invoice-Supported Unit Cost</i>	<i>Difference (%)</i>
<i>RF Catheter (SD155)</i>	\$550	\$325	– \$225 (41%)
<i>Vascular Sheath (SD136)</i>	\$52.80	\$20	– \$32.80 (62%)
<i>Guidewire, Hydrophilic (SD089)</i>	\$43.37	\$13.35	– \$30.02 (69%)
Totals:	\$646.17	\$358.35	– \$287.82 (45%)

In addition to marketing individual supplies at prices below the recommended price finalized by CMS just last year, key supply components are now being bundled into consolidated kits that are also sold at comparatively low prices. This bundling was not reflected in CMS’s updated pricing for these inputs.⁶ The invoices in Attachments 4-10 contain product numbers ranging from CPK50-07 to CPK85-11—all of which are kits that bundle one or more items (see **Table 2**). Many of these kits include both the RF catheter and vascular sheath (referred to as the Introducer Sheath). The content of each kit is demonstrated by the product numbers referenced in the “Description” columns of the invoices: For example, in Attachment 4, kit “CPK64-07” includes two items: (1) the “ClosureFast catheter 60 cm” (the RF catheter described by supply code SD155); and (2) product number “MIS-7F07” (a 7-French vascular sheath described by supply code SD136). The invoice prices of these kits never exceed the \$550 assigned by CMS for RF catheters, and most prices are substantially lower.

Similar to Attachment 4, the invoices in Attachments 5-10 identify kits that include the RF Catheter, vascular sheath, and a “ClosureFast Procedure Pack” (identified by product identifier “CFP”). This procedure pack is regularly sold in kits marketed by the manufacturer, and it appears to include numerous items that are currently reflected as separate cost items by CMS, such as needles, syringes, scalpels, and gowns. The bundling of such a large number of products into a single kit was not considered in the market-based supply update, and the consolidation of products into relatively low-cost kits suggests that the current valuation of CPT 36475 greatly exceeds the cost estimates finalized by CMS.

⁶ StrategyGen utilized specialized methodologies to account for the costs of “Kits, Packs, and Trays.” Because the RF catheter was not analyzed as a kit or pack, there is a strong chance that costs are being double-counted in CMS’s current estimate of practice expenses for CPT 36475.

Table 2. Items Currently Bundled into Kits

<i>Document</i>	<i>Items Currently Included in Kits</i>	<i>CMS-Assigned Cost*</i>	<i>Invoice-Supported Cost per Kit</i>	<i>Difference (%)</i>
<i>Attachment 4</i>	RF catheter (Product #: CF7-7-60, CF7-7-100, CF7-3-60); ClosureFast Procedure Pack (CFP); vascular sheath (MIS-7F07, MIS-7F11, IS-7F07, IS-7F11)	\$623.90	\$475	-\$148.90 (24%)
<i>Attachment 5</i>	RF catheter (CF7-7-100); vascular sheath (MIS-7F07)	\$602.80	\$520	-\$82.80 (14%)
<i>Attachment 6</i>	RF catheter (CF7-7-60); ClosureFast Procedure Pack (CFP); vascular sheath (MIS-7F07)	\$623.90	\$550	-\$73.90 (12%)
<i>Attachment 7</i>	RF catheter (CF7-7-60); ClosureFast Procedure Pack (CFP); vascular sheath (MIS-7F07)	\$623.90	\$550	-\$73.90 (12%)
<i>Attachment 8</i>	RF catheter (CF7-7-60, CF7-7-100, CF7-3-60); ClosureFast Procedure Pack (CFP); vascular sheath (MIS-7F07, MIS-7F11, IS-7F07, IS-7F11)	\$623.90	\$425	-\$198.90 (32%)
			\$450	-\$173.90 (28%)
<i>Attachment 9</i>	RF catheter (CF7-7-100; CF 73-60); ClosureFast Procedure Pack (CFP); vascular sheath (MIS-7F07)	\$623.90	\$300	-\$323.90 (52%)
<i>Attachment 10</i>	RF catheter (CF7-7-100); ClosureFast Procedure Pack (CFP); vascular sheath (MIS-7F07)	\$623.90	\$300	-\$323.90 (52%)

* Because CMS did not calculate pricing for such kits, the CMS-assigned cost used in these calculations is the sum of the individual unit costs for separate items included in each kit.

Finally, we believe that the RF catheter and other supplies used in furnishing CPT 36475 are being re-sterilized by a third party company and sold back to users at discounted prices. Therefore, the true pricing discrepancies prevalent throughout the market are likely to be greater than what the attached invoices demonstrate.

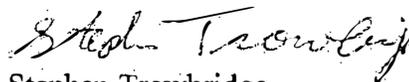
* * *

We respectfully request that CMS review the PE inputs and related pricing applicable to CPT 36475 at the Agency's earliest convenience to ensure they accurately reflect current practice and pricing. As described above, recent observations from the field suggest that: (1) the cost of individual units has fallen dramatically from the costs CMS previously assigned; and (2) when products do approach their CMS-assigned cost, further inspection reveals they are sold in kits containing multiple items for which CMS assigned *separate* values.

We believe this appropriate revision will bring spending for the procedure in line with the procedure's typical costs and eliminate any inappropriate financial motivation to offer the procedure. We appreciate CMS's continued attention to assessing misvalued codes and would

welcome the opportunity to provide further input as needed. Please do not hesitate to contact me at STrowbridge@AngioDynamics.com.

Respectfully submitted,



Stephen Trowbridge
SVP, General Counsel
AngioDynamics, Inc.⁷

Enclosures

⁷ Founded in 1988, AngioDynamics designs, manufactures, and sells a wide range of medical, surgical and diagnostic devices used by professional healthcare providers for the treatment of peripheral vascular disease, vascular access and for use in oncology and surgical settings. We are committed to improving patient outcomes by focusing on the development of innovative technologies to address unmet patient needs and that facilitate the delivery of high-quality patient care.

Attachment 1

PeopleSoft Accounts Payables
EDI INVOICE COPY

Page No:
Run Date:
Run Time:

527
2018
22:30 PM

Business Unit [REDACTED]
Voucher Number [REDACTED]
Voucher Style REG
Vendor [REDACTED]
Vendor Location [REDACTED]

Payment Terms NET45
Control Group
Related Voucher ID

Invoice Number [REDACTED]
Invoice Date [REDACTED] 2018
Miscellaneous 0
Freight 0
VAT 0
Sales Tax 0
Invoice Total 17,550.00
Currency USD
Use Tax 0
VAT Not on Invoice 0

Voucher Line Information

Line	PO ID	Item	Quantity	Unit Price	UOM	Amount	Descr
1	[REDACTED]		54	325	EA	17,550.00	CLOSURE FAST CATH 60CM

Long Descr: RF Catheters

Distribution Information

Dist #	BU GL	Account	Fund	Oper Unit	Dept ID	Program	BU PC	Project	Dist Amt
1	[REDACTED]	[REDACTED]	61	G	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	17,550.00



Page No:
Run Date:
Run Time:

720
2018
22:30 PM

Business Unit [Redacted]
Voucher Number [Redacted]
Voucher Style REG
Vendor [Redacted]
Vendor Location [Redacted]

Payment Terms NET45
Control Group
Related Voucher ID

Invoice Number [Redacted]
Invoice Date [Redacted] 2018
Miscellaneous 0
Freight 0
VAT 0
Sales Tax 0
Invoice Total 1,830.00
Currency USD
Use Tax 0
VAT Not on Invoice 0

Voucher Line Information

Line	PO ID	Item	Quantity	Unit Price	UOM	Amount	Descr
1	[Redacted]	190102	60	30.5	EA	1,830.00	MICRO INTRODUCER 7F X 11CM

Long Descr: ecM: MICRO INTRODUCER 7F X 11CM

Distribution Information

Dist #	BU GL	Account	Fund	Oper Unit	Dept ID	Program	BU PC	Project	Dist Amt
1	[Redacted]	[Redacted]	61	G	[Redacted]	[Redacted]	[Redacted]	[Redacted]	1,830.00

Attachment 2

*** ORIGINAL ***

INVOICE

PAGE	INVOICE DATE
1 of 1	2018



SHIPPING INFORMATION

SHIP DATE: 2018
 SHIPPED FROM: [REDACTED]
 SHIPPED VIA: FEDEX STANDARD OVERNIGHT 3PM
 FREIGHT TERMS: PREPAY & ADD
 BILL OF LADING NO.: [REDACTED]
 PICK TICKET NO.: [REDACTED]
 PRO NUMBER: [REDACTED]

ADD. SHIPPING INFO: Order Shipped in 1 Pallet / Bundle(s)

PURCHASE ORDER NO.		ORDER DATE	INVOICE TERMS		ENTERED BY	ORDER NUMBER
[REDACTED]		2018	NET 60		[REDACTED]	[REDACTED]
PRODUCT CODE	DESCRIPTION	UNITS	U/M	UNIT PRICE	AMOUNT	
MIS-7F07 Lot/Serial # [REDACTED]	MICRO INTRODUCER 7F 7CM 7FX7CM Shipment Tracking Number [REDACTED] Carton # [REDACTED]	3.00	EA	20.0000	60.00	
MIS-7F07 Lot/Serial # [REDACTED]	MICRO INTRODUCER 7F 7CM 7FX7CM Shipment Tracking Number [REDACTED] Carton # [REDACTED]	1.00	EA	20.0000	20.00	
MIS-7F07 Lot/Serial # [REDACTED]	MICRO INTRODUCER 7F 7CM 7FX7CM Shipment Tracking Number [REDACTED] Carton # [REDACTED]	6.00	EA	20.0000	120.00	
MIS-7F07 Lot/Serial # [REDACTED]	MICRO INTRODUCER 7F 7CM 7FX7CM Shipment Tracking Number [REDACTED] Carton # [REDACTED]	2.00	EA	20.0000	40.00	
MIS-7F07 Lot/Serial # [REDACTED]	MICRO INTRODUCER 7F 7CM 7FX7CM Shipment Tracking Number [REDACTED] Carton # [REDACTED]	20.00	EA	20.0000	400.00	
	Freight Charge				42.00	

MAKE CHECKS PAYABLE TO: [REDACTED]

Remit To: [REDACTED]

INVOICE DUE DATE

2018

TOTAL AMOUNT DUE

\$682.00

Products covered by this invoice may be subject to discounts consisting of subsequent rebates or credits pursuant to an agreement(s) between [REDACTED] Customer is responsible for providing information on all discounts and rebates to federal and state health care programs in accordance with all applicable laws and regulations, including without limitation 42 USC § 1320a-7b(3)(A) and 42 CFR § 1001.952(h).

Inquiries: [REDACTED]

Attachment 3

Welcome, [Redacted]
Bill-To: [Redacted]
Ship-To: [Redacted]

[HOME](#)

[HELP](#)

[SELF SERVICE](#)

[SERVICE & WARRANTY](#)

[MY ACCOUNT](#)

[CART](#)

[LOGOUT](#)

ORDER ENTRY

Note: Pricing does not reflect any applicable taxes or fees.

S. #.	Item #	Quantity	UOM	Item Description	Availability	Unit Price (\$)	Extended Price (\$)
1	GW-025-150-DE1.5J	1	Each	GUIDEWIRE .025 IN. 150CM	IN STOCK	\$ 13.35	\$ 13.35
2	CPK55-07	1	Each	KIT: CF7-7-100, CFP, MIS-7F07	IN STOCK	\$ 1,170.00	\$ 1,170.00
3	CPK83-07	1	Each	KIT: CF7-3-60, CFP, MIS-7F07	IN STOCK	\$ 1,170.00	\$ 1,170.00
4	CFP	1	Each	CLF PROCEDURE PACK	IN STOCK	\$ 40.00	\$ 40.00
5	MIS-7F07	1	Each	MICRO INTRODUCER 7F 7CM 7FX7CM	IN STOCK	\$ 20.00	\$ 20.00
6	HKTUBE	1	Box	HK INFILTRATION TUBING SET	IN STOCK	\$ 150.00	\$ 150.00
7	GW-018-45-SS	1	Each	GUIDEWIRE.018 IN.45CM - SS	IN STOCK	\$ 14.55	\$ 14.55
8	VS-402	1	Packages	US VENASEAL SYSTEM 5-PACK	IN STOCK	\$ 9,195.00	\$ 9,195.00
9							
10							
11							
12							
13							
14							
15							

Total: \$11,772.90

[Proceed To Check Out](#)
[View Price and Availability](#)
[Add To Cart](#)
[Add To My List](#)
[Report Price Variance](#)

Attachment 4

Medical Order Form

Date of Order		Account No.	
Billing Name		Shipping Address	
Address		Address	
City		City	
State, Zip		State, Zip	
Phone Number		Purchase Order #	
Fax Number		Contact Name	

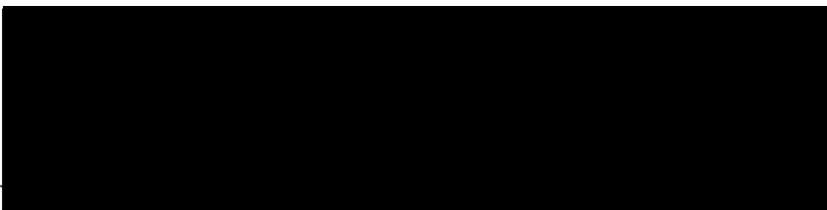
Closure Procedure Kit	Description	Qty.	Price per Package	Extended Cost
<input type="checkbox"/> CPK-64 Please identify sheath size when ordering	1ea CF7-7-60, ClosureFast catheter 7Fr x 60 cm Circle which sheath when ordering. 1ea MIS-7F07 or MIS-7F11, Micro Introducer Sheath Set 7F		\$475.00	
<input type="checkbox"/> CPK-65 Please identify sheath size when ordering	1ea CF7-7-100, ClosureFast catheter 7Fr x 100 cm Circle which sheath when ordering. 1ea MIS-7F07 or MIS-7F11, Micro Introducer Sheath Set 7F		\$475.00	

Deliver by: _____ (see page 3 for shipping options)

Signature _____ Print Name _____ Date _____

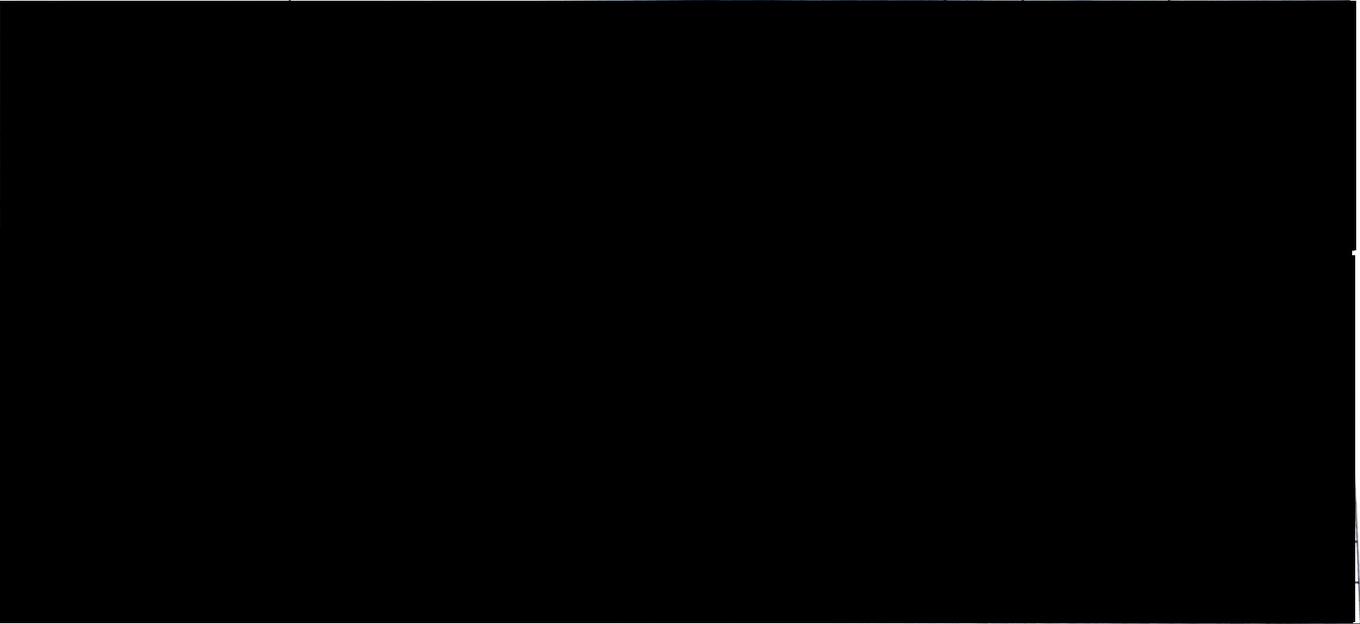
Continued on page 2

Please fax all 3 pages of this form to _____

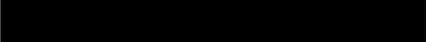


Bill To #		Ship To #	
Billing Name		Ship Name	
Bill to Address		Shipping Address	
City/State/Zip	32	City/State/Zip	32
Phone Number		Purchase Order #	
Fax Number		Contact Name	
Sales Territory#		Sales Rep Name	
Price Effective Dates		Customer Price Effective Dates	

Item Number	Description	Qty / Ea.	Price/ Each	Customer Price/Each
<input type="checkbox"/> CPK64-07	ClosureFast catheter 60 cm, MIS-7F07		\$916.13	\$475.00
<input type="checkbox"/> CPK64-11	ClosureFast catheter 60 cm, MIS-7F11		\$916.13	\$475.00
<input type="checkbox"/> CPK65-07	ClosureFast catheter 100 cm, MIS-7F07		\$916.13	\$475.00
<input type="checkbox"/> CPK65-11	ClosureFast catheter 100 cm, MIS-7F11		\$916.13	\$475.00



Note: All items are subject to sales tax and freight charges



Attachment 5

INVOICE

PAGE	INVOICE DATE	INVOICE NUMBER
1 of 1	2016	

RH

Sold To: [REDACTED]

Ship To: [REDACTED]

[REDACTED ADDRESS]

[REDACTED ADDRESS]

SHIPPING INFORMATION

SHIP DATE: [REDACTED]-2016
 SHIPPED FROM: [REDACTED]
 SHIPPED VIA: FEDEX GROUND
 FREIGHT TERMS: PREPAID
 BILL OF LADING NO.: [REDACTED]
 PICK TICKET NO.: [REDACTED]
 PRO NUMBER: [REDACTED]

ADD. SHIPPING INFO: Order Shipped in 1 Pallet / Bundle(s)

PURCHASE ORDER NO.	ORDER DATE	INVOICE TERMS	ENTERED BY	ORDER NUMBER	
2016-[REDACTED]	[REDACTED] 2016	NET 60	[REDACTED]	[REDACTED]-[REDACTED]	
PRODUCT CODE	DESCRIPTION	UNITS	U/M	UNIT PRICE	AMOUNT
CPK65-07	Shipment Tracking Numbers: [REDACTED] [REDACTED] KIT: CF7-7-100, MIS-7F07	2.00	EA	520.0000	1,040.00
	8.875 % Total Tax				92.30

MAKE CHECKS PAYABLE TO: [REDACTED]

Remit To: [REDACTED]

INVOICE DUE DATE	TOTAL AMOUNT DUE
[REDACTED]-2016	\$1,132.30

Products covered by this invoice may be subject to discounts consisting of subsequent rebates or credits pursuant to an agreement(s) between Customer and [REDACTED]. Customer is responsible for providing information on all discounts and rebates to federal and state health care programs in accordance with all applicable laws and regulations, including without limitation 42 USC § 1320a-7b(3)(A) and 42 CFR § 1001.952(h).

Inquiries: [REDACTED]

Attachment 6

*** ORIGINAL ***

INVOICE

PAGE	INVOICE DATE	INVOICE NUMBER
1 of 1	██████████ 2015	██████████

RH

Sold To: ██████████

Ship To : ██████████



SHIPPING INFORMATION

SHIP DATE: ██████████ 2015
 SHIPPED FROM: ██████████
 SHIPPED VIA: FEDEX GROUND
 FREIGHT TERMS: PREPAID
 BILL OF LADING NO.: ██████████
 PICK TICKET NO.: ██████████
 PRO NUMBER: ██████████

ADD. SHIPPING INFO: Order Shipped in 2 Pallet / Bundle(s)

PURCHASE ORDER NO.	ORDER DATE	INVOICE TERMS	ENTERED BY	ORDER NUMBER	
██████████	██████████ 2015	NET 10	██████████	██████████	
PRODUCT CODE	DESCRIPTION	UNITS	U/M	UNIT PRICE	AMOUNT
CPK54-07	Shipment Tracking Numbers: ██████████ ██████████ KIT: CF7-7-60, CFP, MIS-7F07	2.00	EA	550.0000	1,100.00
	8.875 % Total Tax				97.63

MAKE CHECKS PAYABLE TO: ██████████

Remit To: ██████████

INVOICE DUE DATE	TOTAL AMOUNT DUE
██████████ 2015	\$1,197.63

Products covered by this invoice may be subject to discounts consisting of subsequent rebates or credits pursuant to an agreement(s) between Customer and ██████████. Customer is responsible for providing information on all discounts and rebates to federal and state health care programs in accordance with all applicable laws and regulations, including without limitation 42 USC § 1320a-7b(b)(3)(A) and 42 CFR § 1001.952(h).

Inquiries: ██████████

*** ORIGINAL ***

INVOICE

PAGE	INVOICE DATE	INVOICE NUMBER
1 of 1	2015	

RH

Sold To:

Ship To :



SHIPPING INFORMATION

SHIP DATE: 2015
 SHIPPED FROM:
 SHIPPED VIA: FEDEX GROUND
 FREIGHT TERMS: PREPAID
 BILL OF LADING NO.:
 PICK TICKET NO.:
 PRO NUMBER:

ADD. SHIPPING INFO: Order Shipped in 2 Pallet / Bundle(s)

PURCHASE ORDER NO.	ORDER DATE	INVOICE TERMS	ENTERED BY	ORDER NUMBER	
	2015	NET 60			
PRODUCT CODE	DESCRIPTION	UNITS	U/M	UNIT PRICE	AMOUNT
	Shipment Tracking Numbers:				
CPK64-07	KIT: CF7-7-60, MIS-7F07	2.00	EA	530.0000	1,060.00
CPK85-07	KIT: CF7-3-60, MIS-7F07	1.00	EA	530.0000	530.00
	8.875 % Total Tax				141.12

MAKE CHECKS PAYABLE TO:

Remit To:

INVOICE DUE DATE	TOTAL AMOUNT DUE
2015	\$1,731.12

Products covered by this invoice may be subject to discount or other adjustments of subsequent rebates or credits pursuant to an agreement(s) between Customer and [redacted]. Customer is responsible for providing information on all discounts and rebates to federal and state health care programs in accordance with all applicable laws and regulations, including without limitation 42 USC § 1320a-7b(3)(A) and 42 CFR § 1001.952(h).

Inquiries:

*** ORIGINAL ***

INVOICE

PAGE	INVOICE DATE	INVOICE NUMBER
1 of 1	2015	

RH

Sold To:

Ship To :



SHIPPING INFORMATION

SHIP DATE: 2015
 SHIPPED FROM:
 SHIPPED VIA: FEDEX GROUND
 FREIGHT TERMS: PREPAID
 BILL OF LADING NO.:
 PICK TICKET NO.:
 PRO NUMBER:

ADD. SHIPPING INFO: Order Shipped in 1 Pallet / Bundle(s)

PURCHASE ORDER NO.	ORDER DATE	INVOICE TERMS	ENTERED BY	ORDER NUMBER	
		NET 60			
PRODUCT CODE	DESCRIPTION	UNITS	U/M	UNIT PRICE	AMOUNT
CPK64-07	Shipment Tracking Numbers: KIT: CF7-7-60, MIS-7F07	1.00	EA	530.0000	530.00
	8.875 % Total Tax				47.04

MAKE CHECKS PAYABLE TO:

Remit To:

INVOICE DUE DATE

TOTAL AMOUNT DUE

2015

\$577.04

Products covered by this invoice may be subject to discounts consisting of subsequent rebates or credits pursuant to an agreement(s) between Customer and . Customer is responsible for providing information on all discounts and rebates to federal and state health care programs in accordance with all applicable laws and regulations, including without limitation 42 USC § 1320a-7b(b)(3)(A) and 42 CFR § 1001.952(h).

Inquiries:

Attachment 7

*** REPRINT ***

INVOICE

PAGE	INVOICE DATE	INVOICE NUMBER
1 of 1	-2016	

RH

Sold To: [REDACTED]
[REDACTED]

Ship To: [REDACTED]
[REDACTED]

SHIPPING INFORMATION

SHIP DATE: [REDACTED]-2016
 SHIPPED FROM: [REDACTED]
 SHIPPED VIA: FEDEX GROUND
 FREIGHT TERMS: PREPAID
 BILL OF LADING NO.: [REDACTED]
 PICK TICKET NO.: [REDACTED]
 PRO NUMBER: [REDACTED]

ADD. SHIPPING INFO: Order Shipped in 3 Pallet / Bundle(s)

PURCHASE ORDER NO.	ORDER DATE	INVOICE TERMS	ENTERED BY	ORDER NUMBER	
[REDACTED]	[REDACTED]-2016	NET 60	[REDACTED]	[REDACTED]	
PRODUCT CODE	DESCRIPTION	UNITS	U/M	UNIT PRICE	AMOUNT
CPK54-07	Shipment Tracking Numbers: [REDACTED] KIT: CF7-7-60, CFP, MIS-7F07	8.00	EA	550.0000	4,400.00
8.875 % Total Tax					390.50

MAKE CHECKS PAYABLE TO: [REDACTED]
 Remit To: [REDACTED]

INVOICE DUE DATE	TOTAL AMOUNT DUE
[REDACTED]-2017	\$4,790.50

Products covered by this invoice may be subject to discounts consisting of subsequent rebates or credits pursuant to an agreement(s) between Customer and [REDACTED]. Customer is responsible for providing information on all discounts and rebates to federal and state health care programs in accordance with all applicable laws and regulations, including without limitation 42 USC § 1320a-7b(b)(3)(A) and 42 CFR § 1001.952(h).

Inquiries: [REDACTED]

*** REPRINT ***

INVOICE

PAGE	INVOICE DATE	INVOICE NUMBER
1 of 1	██████-2017	██████

RH

Sold To: ██████████

Ship To: ██████████

SHIPPING INFORMATION

SHIP DATE: ████████ 2017
 SHIPPED FROM: ██████████
 SHIPPED VIA: FEDEX GROUND
 FREIGHT TERMS: PREPAID
 BILL OF LADING NO.: ██████████
 PICK TICKET NO.: ██████████
 PRO NUMBER: ██████████

ADD. SHIPPING INFO: Order Shipped in 3 Pallet / Bundle(s)

PURCHASE ORDER NO.	ORDER DATE	INVOICE TERMS	ENTERED BY	ORDER NUMBER	
██████████	██████████ 2017	NET 60	██████████	██████████	
PRODUCT CODE	DESCRIPTION	UNITS	U/M	UNIT PRICE	AMOUNT
CPK54-07	Shipment Tracking Numbers: ██████████ ██████████ KIT: CF7-7-60, CFP, MIS-7F07	10.00	EA	550.0000	5,500.00
8.875 % Total Tax					488.13

MAKE CHECKS PAYABLE TO: ██████████

Remit To: ██████████

INVOICE DUE DATE	TOTAL AMOUNT DUE
██████████ 2017	\$5,988.13

Products covered by this invoice may be subject to discounts, consisting of subsequent rebates or credits pursuant to an agreement(s) between Customer and ██████████. Customer is responsible for providing information on all discounts and rebates to federal and state health care programs in accordance with all applicable laws and regulations, including without limitation 42 USC § 1320a-7b(b)(3)(A) and 42 CFR § 1001.952(h).

Inquiries: ██████████

Attachment 8

DATE: [REDACTED] 15
TIME: 10:27:08

GROUP CODE: [REDACTED]
COMMITMENT TYPE: [REDACTED]
PREVIOUS CONTRACT #: [REDACTED]

AGREEMENT NUMBER : [REDACTED]

EFFECTIVE DATE: [REDACTED] 201
EXPIRATION DATE: [REDACTED] 2020

This agreement is valid for the authorized membership during the dates that this agreement is effective. Authorized members will solely determine which agreement they wish to use in each [REDACTED] product group.

For information regarding full customer eligibility please contact the [REDACTED] contract department.

ITEM NUMBER / ITEM DESCRIPTION	SELL UOM	BASE UOM	CASE QTY	MAX QTY	SELL UOM	PRICE	P/C	ITEM EFF DATE	ITEM EXP DATE
[REDACTED]									
CPK50-07 KIT: CF7-7-60, CFP, IS-7F07	EA	EA	1	999999999		450.0000		13	20
CPK50-11 KIT: CF7-7-60, CFP, IS-7F11	EA	EA	1	999999999		450.0000		13	20
CPK51-07 KIT: CF7-7-100, CFP, IS-7F07	EA	EA	1	999999999		450.0000		13	20
CPK51-11 KIT: CF7-7-100, CFP, IS-7F11	EA	EA	1	999999999		450.0000		13	20
CPK54-07 KIT: CF7-7-60, CFP, MIS-7F07	EA	EA	1	999999999		450.0000		13	20
CPK54-11 KIT: CF7-7-60, CFP, MIS-7F11	EA	EA	1	999999999		450.0000		13	20
CPK55-07 KIT: CF7-7-100, CFP, MIS-7F07	EA	EA	1	999999999		450.0000		13	20
CPK55-11 KIT: CF7-7-100, CFP, MIS-7F11	EA	EA	1	999999999		450.0000		13	20
CPK64-07 KIT: CF7-7-60, MIS-7F07 <i>new</i>	EA	EA	1	999999999		425.0000		13	20
CPK64-11 KIT: CF7-7-60, MIS-7F11 <i>new</i>	EA	EA	1	999999999		425.0000		13	20
CPK65-07 KIT: CF7-7-100, MIS-7F07	EA	EA	1	999999999		425.0000		13	20
CPK65-11 KIT: CF7-7-100, MIS-7F11	EA	EA	1	999999999		425.0000		13	20
CPK68-07 KIT: CF7-7-60, IS-7F11	EA	EA	1	999999999		425.0000		13	20
CPK68-11 KIT: CF7-7-60, IS-7F11	EA	EA	1	999999999		425.0000		13	20
CPK69-07 KIT: CF7-7-100, IS-7F07	EA	EA	1	999999999		425.0000		13	20
CPK69-11 KIT: CF7-7-100, IS-7F11	EA	EA	1	999999999		425.0000		13	20
CPK82-07 KIT: CF7-3-60, CFP, IS-7F07	EA	EA	1	999999999		450.0000		13	20
CPK82-11 KIT: CF7-3-60, CFP, IS-7F11	EA	EA	1	999999999		450.0000		13	20
CPK83-07 KIT: CF7-3-60, CFP, MIS-7F07	EA	EA	1	999999999		450.0000		13	20
CPK83-11 KIT: CF7-3-60, CFP, MIS-7F11	EA	EA	1	999999999		450.0000		13	20
CPK84-07 KIT: CF7-3-60, IS-7F07	EA	EA	1	999999999		425.0000		13	20
CPK84-11 KIT: CF7-3-60, IS-7F11	EA	EA	1	999999999		425.0000		13	20
CPK85-07 KIT: CF7-3-60, MIS-7F07	EA	EA	1	999999999		425.0000		13	20
CPK85-11 KIT: CF7-3-60, MIS-7F11	EA	EA	1	999999999		425.0000		13	20

[REDACTED] with written notice, may cancel this agreement at anytime prior to the effective date or with 30 days notice after this agreement becomes effective.

Attachment 9

From: [REDACTED]
Sent: [REDACTED] 2019 [REDACTED]
To: [REDACTED] >
Cc: [REDACTED] >
Subject: Order Confirmation E-mail For Order [REDACTED]

[REDACTED]

This notification is from [REDACTED]
Dear [REDACTED],

Thank You for your order. Please review your Order Details.

Billing Address:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Shipping Address:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Order/Confirmation #: [REDACTED] **PO #:** [REDACTED]
Order Type: Standard Order **Order Date:** [REDACTED] 2019
Order Total Excluding Tax: 15525.00

Comments:
Item Details:

Line #	Item #	Description	Status	UOM	Quantity	Unit Price	Pricing UOM	Extended Price	Contract Pricing
2.000	CPK55-07	KIT: CF7-7-100, CFP, MIS-7F07	In-Process	Each	40	\$ 300.00	Each	\$ 12000.00	
	Description	Qty	UnitPrice						
	CLOSURE FAST CATH 100CM	40	0.00						
	CLF PROCEDURE PACK	40	0.00						
	MICRO INTRODUCER 7F 7CM 7FX7CM	40	0.00						
3.000	CPK83-07	KIT: CF7-3-60, CFP, MIS-7F07	In-Process	Each	10	\$ 300.00	Each	\$ 3000.00	
	Description	Qty	UnitPrice						
	CLOSURE CATH 3CM COIL	10	0.00						
	CLF PROCEDURE PACK	10	0.00						
	MICRO INTRODUCER 7F 7CM 7FX7CM	10	0.00						

Thank you again for your order. We appreciate your business.

Thank you for using [REDACTED]

Contact Information

Customer Service: [REDACTED]

Email: [REDACTED]

Attachment 10

From: [REDACTED]
Sent: [REDACTED] 2019 [REDACTED]
To: [REDACTED]
Subject: Order Confirmation E-mail For Order [REDACTED]

[REDACTED]



This notification is from [REDACTED]
Dear [REDACTED],

Thank You for your order. Please review your Order Details.

Billing Address:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Shipping Address:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Order/Confirmation #: [REDACTED] **PO #:** [REDACTED]
Order Type: Standard Order **Order Date:** [REDACTED]/2019
Order Total Excluding Tax: 48843.00

Comments:
Item Details:

Line #	Item #	Description	Status	UOM	Quantity	Unit Price	Pricing UOM	Extended Price	Contract Pricing
2.000	RFS2-6-12	CLOSURERFS CATHETER 6F 12CM	In-Process	Each	6	\$ 378.00	Each	\$ 2268.00	
3.000	CPK55-07	KIT: CF7-7-100, CFP, MIS-7F07	In-Process	Each	150	\$ 300.00	Each	\$ 45000.00	
	Description	Qty	UnitPrice						
	CLOSURE FAST CATH 100CM	150	0.00						
	CLF PROCEDURE PACK	150	0.00						
	MICRO INTRODUCER 7F 7CM 7FX7CM	150	0.00						

Thank you again for your order. We appreciate your business.

Thank you for using [REDACTED]

Contact Information

Customer Service: [REDACTED]

Email: [REDACTED]