



University of Colorado  
Anschutz Medical Campus

**Isaac Teitelbaum, MD**  
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Seema Verma, MPH  
Administrator  
Centers for Medicare & Medicaid Services  
Attention: CMS-1715-IFC  
P.O. Box 8016  
Baltimore, MD 21244-8016

RE: Potentially Misvalued Code  
Request for Non-facility Pricing of CPT Code 49436

Dear Ms. Verma,

I am the medical director of the home dialysis program at the University of Colorado. In this capacity, I have performed externalizations of embedded peritoneal dialysis catheters more than 200 times, always- every last one- in the outpatient setting. I have had not a single serious complication. In my opinion it is unequivocally safe to perform this procedure in an outpatient office. Unfortunately, supplies for this procedure are not covered by CMS. This drives many physicians to perform the procedure in the more expensive facility environment. I believe that the use of embedded catheters would increase if physicians didn't have to foot the bill for the supplies.

Thank you very much for your consideration of this matter.

Sincerely,

A handwritten signature in black ink that reads "Isaac Teitelbaum" with a stylized flourish at the end.

Isaac Teitelbaum, MD  
Professor of Medicine