**From:** Keith Berman <kberman626@outlook.com>   
**Sent:** Saturday, February 11, 2023 8:15 PM  
**To:** Chan, Larry (CMS/CM) <Larry.Chan@cms.hhs.gov>  
**Cc:** CMS MedicarePhysicianFeeSchedule <MedicarePhysicianFeeSchedule@cms.hhs.gov>; CMS PE\_Price\_Input\_Update <PE\_Price\_Input\_Update@cms.hhs.gov>  
**Subject:** FW: Nomination for CMS review

Dear Mr. Chan,

My nomination for CMS review of the valuation of **CPT 36514** (therapeutic plasma exchange; TPE) neglected to include an explanation of the methodology used to calculate average selling prices (ASPs) for two mis-valued supply items (**SC084** and **SC085**).

I have provided this important information below (underlined), including email and phone contact information for representatives of the two manufacturers that supplied their unit sales volumes and ASPs used to calculate the overall ASP for SC084 and SC085. [Please note also that Terumo BCT is the predominant U.S. supplier of plasma exchange tubing sets (SC084) used to perform CPT 36514; Fresenius Kabi/Fenwal does not manufacture or sell plasma exchange tubing sets].

***CPT 36514****: Mis-valuation of two supply items*

Two supply items in the Supply file which are utilized in the performance of each TPE procedure are misvalued.  These items are identified below with their supply code, current price, and the average selling price (ASP) that represents information provided by the two manufacturers (Terumo BCT and Fresenius Kabi/Fenwal) that, according to independent market research,[[1]](#footnote-1)[1] account for 96% of the U.S. market:

|  |  |  |  |
| --- | --- | --- | --- |
| cms\_code | Description | Price (existing)[[2]](#footnote-2)[2] | **ASP** |
| **SC085** | Tubing set, plasma exchange | $186.12 | **$248.77** |
| **SC084** | Tubing set, blood warmer | $8.01 | **$14.71** |

These ASP values represent a unit sales volume-weighted average of the Q4 2022 ASP of Terumo BCT’s *Spectra Optia* Exchange Set and the full-year 2022 ASP for Fresenius Kabi/Fenwal’s Amicus Exchange Kit.  These data supplied to me for purposes of calculating the overall ASPs in the above table are sensitive.  However, representatives of each manufacturer indicated that they will be happy to directly provide their unit sales and ASPs to CMS.  Their email and phone contact information is provided in the footnote below.13

13**Terumo BCT**: Carly Newton (Manager, Therapy Access), [Carly.Newton@terumobct.com](mailto:Carly.Newton@terumobct.com) (email), 720-548-0429.

**Fresenius Kabi/Fenwal**: Jeremy McGough (Sales Manager, Therapeutic Apheresis), [Jeremy.Mcgough@fresenius-kabi.com](mailto:Jeremy.Mcgough@fresenius-kabi.com), 314-722-0393.

In case it’s necessary or useful for your review, I have also updated and attached the nomination letter to include this information.

Thank you again for your attention to this request for CMS review.

Keith Berman, MPH, MBA

Health Research Associates

55 W. Sierra Madre Blvd., Suite 115

Sierra Madre, CA 91024 USA

1 (626) 665-1898

[kberman626@outlook.com](mailto:kberman626@outlook.com)

**From:** Keith Berman <kberman626@outlook.com>   
**Sent:** Friday, February 10, 2023 8:26 PM  
**To:** CMS MedicarePhysicianFeeSchedule <MedicarePhysicianFeeSchedule@cms.hhs.gov>  
**Cc:** Chan, Larry (CMS/CM) <Larry.Chan@cms.hhs.gov>  
**Subject:** FW: Nomination for CMS review

Dear CMS,

An important section of the subject request was inadvertently omitted in our correspondence emailed to you earlier today.

Please discard the original document and substitute the attached file, which is named:

**CORRECTED\_Potentially misvalued codes\_CPT 36514\_36516\_36522\_Nomination for CMS review\_2.10.2023**

Thank you again for your attention to this request for CMS review.

Keith Berman, MPH, MBA

Health Research Associates

55 W. Sierra Madre Blvd., Suite 115

Sierra Madre, CA 91024 USA

1 (626) 665-1898

[kberman626@outlook.com](mailto:kberman626@outlook.com)

**From:** Keith Berman <kberman626@outlook.com>   
**Sent:** Friday, February 10, 2023 5:08 PM  
**To:** CMS PE\_Price\_Input\_Update <PE\_Price\_Input\_Update@cms.hhs.gov>  
**Cc:** Chan, Larry (CMS/CM) <Larry.Chan@cms.hhs.gov>  
**Subject:** RE: Misvaluation of two supply items (SC084 and SC085)

Dear CMS,

An important typographical was identified in a table near the bottom of page 4:  tubing set, blood warmer is **SC084** and not SD188.

The corrected letter with the correct supply code (SC084) is attached.

Thank you for replacing the original correspondence.

Kind regards,

Keith Berman, MPH, MBA

Health Research Associates

55 W. Sierra Madre Blvd., Suite 115

Sierra Madre, CA 91024 USA

1 (626) 665-1898

[kberman626@outlook.com](mailto:kberman626@outlook.com)

**From:** Keith Berman <kberman626@outlook.com>   
**Sent:** Friday, February 10, 2023 4:57 PM  
**To:** CMS PE\_Price\_Input\_Update <PE\_Price\_Input\_Update@cms.hhs.gov>  
**Cc:** Chan, Larry (CMS/CM) <Larry.Chan@cms.hhs.gov>  
**Subject:** Misvaluation of two supply items (SC084 and SC085)

Dear CMS,

Thank you for your attention to this request for CMS review of two misvalued supply items used to perform CPT 36516.

Keith Berman, MPH, MBA

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1. [1] GlobalData plc. U.S. Hospital SKU Level Trackers (June 2020). [↑](#footnote-ref-1)
2. [2] CMS-1770-F\_PUF\_Supply [↑](#footnote-ref-2)