

September 01, 2021

Ms. Chiquita Brooks-LaSure  
Administrator  
Centers for Medicare and Medicaid Services  
Department of Health and Human Services  
Attention: CMS-1751-P  
P.O. Box 8016  
7500 Security Boulevard  
Baltimore, MD 21244-8016  
*Submitted electronically:* <http://www.regulations.gov>

Re: File Code CMS-1751-P; Medicare Program; CY 2022 Payment Policies under the Physician Payment Schedule and Other Changes to Part B Payment Policies; (July 23, 2021)

Dear Administrator Brooks-LaSure:

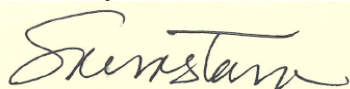
My name is Sunita Srivastava and I am a Board-Certified Vascular Surgeon who works at the Massachusetts General Hospital. I take care of patients with peripheral arterial disease (PAD) among other vascular diseases. The Boston area has a large minority population with significant risk factors for PAD as well as many other co-morbidities. My practice involves caring for these patients to reduce the risk of PAD related complications including stroke, limb loss and death.

I am writing regarding the Centers for Medicare and Medicaid Services (CMS) 2022 Physician Fee Schedule (PFS) proposed rule, released on July 13, 2021, which in its present form will result in cuts as high as 20% to critical services I perform in my non-facility office-based vascular office. If these cuts are implemented on January 1, 2022, it will be challenging to keep open our nonfacility site and will overburden our facility where we are over capacity in terms of hospital beds, OR rooms and clinic appointments.

The devastating cuts to our services will over burden our hospital resources, ability to delivery efficient and effective care as well as add to the overwhelming burnout and ability of health care professionals to deal with the shift in facility demands.

The proposed 20% cuts in Medicare reimbursement for PAD procedures performed in non-facility office based setting will result in the shift of high quality vascular care from the office based setting to the hospital setting. **Please DO NOT implement the Medicare rates as proposed.**

Sincerely,

A handwritten signature in black ink, appearing to read "Sunita", is written over a yellow rectangular background.

Sunita D Srivastava MD FACS  
Board Certified Vascular Surgeon