



**Pain Care
Surgery**

108 Airway Drive, Marion, Illinois 62959 | Phone: 618-997-7820 | Fax: 618-997-6721



Ambulatory Surgery Center

2831 Lone Oak Rd. Paducah, Kentucky 42003 | Phone: (270) 554-8373 | Fax: (270) 554-8987
Email: info@thepainmd.com | Web: www.ascpaducah.com

RECEIVED

OCT 16 2013

**HEALTH FACILITIES &
SERVICES REVIEW BOARD**

October 15, 2013

Ms. Courtney Avery
Administrator
Illinois Health Facilities and Services Review Board
525 West Jefferson
Springfield, IL 62761

Re: Massac County Surgery Center
Project 13-052

Dear Ms. Avery:

On behalf of Pain Care Surgery, located in Marion, Illinois, Ambulatory Surgery Center, located in Paducah, Kentucky, and the Pain Management Centers of Marion and Paducah, we reviewed with great interest the application for the Massac County Surgery Center. After careful review of the data, we strongly oppose this application for a surgery center in Massac County. We fear this facility will be an unlimited surgical facility accepting patients for any type of surgery. It proposes to draw over 90% of the patients from Kentucky and disproportionately eliminates Medicaid patients. Consequently, this would negatively impact Pain Care Surgery in Marion, Illinois, Ambulatory Surgery Center in Paducah, Kentucky, Lourdes Hospital in Paducah, Kentucky, Surgicare in Paducah, Kentucky, and Baptist Health or Western Baptist Hospital in Paducah, Kentucky, all of whom place no restrictions on Medicaid patients. Further, it would create a monopoly in orthopedic, spine, neurological (spine) services, pain management, physical therapy, and imaging, by consolidating multiple practices and specialties. Finally, it would also drain revenues from Kentucky as patients would have no other choice but to follow this group eventually leading to unusually excessive charges affecting all walks of life, both in Illinois and Kentucky.

Western Kentucky Orthopedics is a new organization with a complex structure, and a limited and complicated history. Their role in Western Kentucky has not been quite established even though they continue to expand rapidly, impacting many sectors of health care in Western Kentucky and far Southern Illinois with consolidation and monopolistic tendencies. It appears that the Review Board or the involved entities, including those opposing, have not seen their structure and the arrangement with Massac Memorial. Western Kentucky Orthopedics made exactly the same statements in Paducah about developing Western Kentucky. Now they propose moving 80% to 90% of their cases to Southern Illinois, yet their advertisements show their allegiance to Kentucky (Attachment A).

If Massac Memorial does not survive this venture, the only acute care hospital in this area will be lost.

Exploding health care costs are a major discussion on a daily basis. The majority of the funding for health care services is from governmental agencies under the Affordable Care Act. The goal is to improve access and reduce costs by improving the quality of care; neither of these will be achieved. In fact, we believe that this project will be harmful, not only for Western Kentucky, but for Southern Illinois, mainly for Massac Memorial Hospital. The following issues need to be considered in providing the Certificate of Need for this facility.

1. SCOPE OF THE FACILITY

The scope of this facility does not appear to be limited, but appears to be a multispecialty, ambulatory surgery center. The application shows that they will be performing only orthopedic and podiatry cases; however, a closer look at the proposed cases shows that they will not only be performing orthopedics and podiatry, but also neurology and pain management. Their intent to perform pain management is also bolstered by their newly announced intent to open a pain management clinic in Paducah, entitled "Urgent Care & Pain Management Clinic." (Attachment B)

Multiple neurology and pain management procedures are included in their application such as spinal cord stimulation and nerve blocks. Further, this does not preclude any rapid expansion as foreseen in their discussions and previous actions.

2. PROJECTED CASE LOAD

Projected patient volume as indicated by the application is mainly from Western Kentucky.

The application projects 1,935 orthopedic surgeries and 542 podiatric surgery procedures with a total of 2,613 cases per year in Massac County. The total number of orthopedic surgeries performed in McCracken County in 2012 was 3,246 as shown in the Kentucky Ambulatory Surgical Services report (Attachment C). Considering that all the surgeons are not participating from their own group completely, and there are other orthopedic surgeons, these volumes look extremely high, despite transferring 80% of cases.

Western Kentucky Orthopedics was a partner in the Ambulatory Surgery Center with 50% ownership, though minority interest, with fewer voting shares. They promised 2,200 cases per year to be performed. During 2010, they performed 325 cases and during 2011, they performed 677 cases.

	2010	2011
Brian Kern, MD	155	316
Clint Hill, MD	24	15
Stephen Jackson, MD	65	102
Burton Stodghill, MD	78	151
Thane Deweese, MD	3	24
William Adams, DPM	0	60
Brandon Streng, MD	0	9
Shiraz Patel, MD	0	0
Total	325	677

3. COST OF CARE

A net patient revenue projected at over \$8 million with a net income of almost \$3 million is extremely high and unrealistic.

If there is that much income, Massac County Hospital should take this opportunity and do all orthopedics at the hospital.

Generally one would assume that the cost of care will be less and that this project will assist the public in reducing health care costs; however, the application shows a different story. Even considering hospital outpatient reimbursements which they may plan to obtain, they continue to be extremely high. If hospital outpatient department (HOPD) rates are available, one should look at the advantages for Massac Memorial. Massac Memorial could expand and provide all these services and if the projections are accurate, Massac Memorial would make \$3 million per year in profits which will be a bonanza for this county. However, these are not realistic projections in either case. Most likely they would be receiving ambulatory surgery center reimbursements. Even if they are able to obtain HOPD reimbursements, it will not last any longer than 2014. After that payments will be equalized for the majority of procedures.

As shown in Attachment D, a simple example is CPT 20610, injection of a joint is being charged at \$1,665 for which ambulatory surgery center rates provide \$22 reimbursement. In an HOPD setting reimbursement would be \$183 (which will not last too long); showing that the charges are 76 times more than ambulatory surgery center or in-office treatment. No one knows how many of these codes will be added to the procedure list. There appears to be no such mechanism to control these codes in the future.

Forty-six codes or 43% of the procedures performed are not even approved to be performed in an ambulatory surgery center, whereas, even 24% are not approved for HOPD. The reimbursement based on ASC for Medicare ranges from 0% to a maximum of 20% of the charges. Converting this to Medicaid reimbursement, it will be even less. Consequently, the project will be cost prohibitive for patients from Western Kentucky and Massac County and other Illinois counties as they will be forced to receive services from them because of the monopoly.

4. IMPACT ON OTHER FACILITIES:

The Massac County Surgery will cause significant impact on the following facilities:

Pain Care Surgery in Marion, Illinois
Ambulatory Surgery Center in Paducah, Kentucky
Surgicare in Paducah, Kentucky
Baptist Health or Western Baptist Hospital, Paducah, Kentucky
Lourdes Hospital, Paducah, Kentucky

Starting of pain management in Kentucky and doing all of the procedures in Illinois may also have other issues related to these patients. If they do not provide them long-term opioid therapy and other facilities in the area will be over loaded with patients on opioids and not being able to get assistance from them after they finish interventional techniques.

Above all, it will impact Massac Memorial substantially by taking away a multitude of services. The applicant, which has a complicated structure, also owns a physical therapy and an MRI. The literature is replete that services are increasingly provided in these facilities which increase health care costs without improving access or quality, but reduce hospital revenues.

5. IMPACT ON COVERAGE POLICIES

It is also essential to look at what insurers in Kentucky would say about moving all of their patients to Illinois purposefully. Do they have contracts with all insurers?

It will be very unusual for 80% of the patients from Kentucky to be willing to go to Metropolis, which is a small town with smaller facilities. Do they have consents in real life?

6. SPORADIC ACCEPTANCE OF MEDICAID

Western Kentucky Orthopedics routinely has only sporadically accepted Illinois Medicaid patients and rarely accepted Kentucky Medicaid patients. For the purposes of this application, they may have changed their policy now. Even if they accept them, the appointment sometimes may be approximately 18 months or so to see a surgeon.

Massac County disproportionately consists of Medicaid patients. As an example, the volume of Medicaid patients at Pain Care Surgery is 48% (315/651). Among the patients at the Ambulatory Surgery Center for pain management from Illinois, the Medicaid patients constitute 37% of the volume. In contrast, Western Kentucky Orthopedics, while operating at the Ambulatory Surgery Center, performed 0.3% of Illinois Medicaid patients in 2010 and 1% in 2011. In the same vein, they have performed 6% in 2010 and 10% in 2011 of Kentucky Medicaid patients, despite the fact that it was not managed care at the time. Further, the ambulatory surgery center had no restrictions. The board can also look at the present Illinois surgery center owned by one of the same groups with their acceptance rate of Medicaid patients and surgical volume at this center. We routinely see the patients that are being refused care for orthopedics in Illinois also and they continue to go to other areas.

Thus, all Illinois Medicaid patients would still go to Cape Girardeau, Mt. Vernon, St. Louis, and many other areas because they will not be cared for by orthopedic surgeons locally. Similarly, a majority of the patients from Western Kentucky will be traveling to other areas including other states.

7. AVAILABILITY OF OPERATING ROOM SPACE

There are multiple operating rooms available not only at Massac County Hospital, but also in Paducah, Kentucky. The Ambulatory Surgery Center has 2 operating rooms open 4 days a week, not being utilized. Lourdes Ambulatory Surgery Center or Surgicare will have excess capacity. The same applies to Lourdes Hospital as well as Baptist Health or Western Baptist Hospital.

Above all, Massac County Hospital is functioning at 25% of its capacity. They may even take away some of the simple cases from Massac County Hospital. Thus, if Massac is performing fewer than 500 cases, the remaining capacity of 2,500 will be quite satisfactory for the orthopedic group even if they desire to move all the cases from Paducah.

The argument that orthopedics cannot be performed at Massac County Hospital is disingenuous. They are state approved operating rooms which are amenable for all types of surgery, except cardiac or neurosurgery, and maybe total joint replacements. These operating rooms could be converted by spending half a million dollars for equipment, etc. These facilities could be used much more efficiently.

Western Kentucky Orthopedics has made multiple deals with local hospitals in Paducah, mainly Baptist Health or Western Baptist Hospital. Western Baptist Hospital provided the land to Western Kentucky Orthopedics. After Western Kentucky Orthopedics opened with its MRI and physical therapy it is rumored that Baptist Health will close its Baptist Imaging which was built at a cost of millions of dollars.

8. SELF REFERRAL AND ABUSE ISSUES

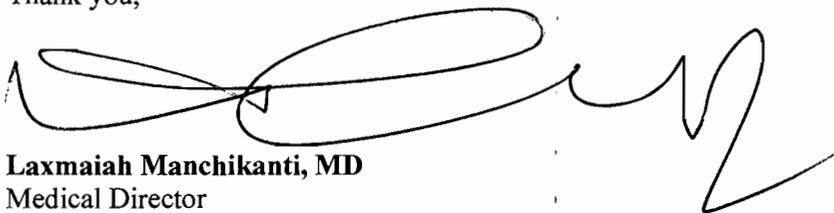
The Board may also want to look into multiple abuse issues in reference to self referrals and ancillary services, even though surgery centers are exempted from Stark. Further, Massac County Hospital operates with federal and state dollars and may be risking public funds. At minimum an opinion from the attorney general or Office of Inspector General, either from in Illinois or HHS/OIG, will be appropriate. It is essential to analyze further the implications of the arrangements of Massac Memorial with the orthopedic group. The future of Massac Memorial Hospital and the community, if it survives and more importantly, if the center does not survive.

Consequently, we are opposed for the multiple reasons as described above. If the board feels that it is essential to provide Massac County Surgery Center a certificate of need, it should be:

- ♦ Limited surgery, excluding neurology and pain management.
- ♦ They should accept without discrimination, without delay, all Illinois and Kentucky Medicaid patients.
- ♦ Addition of any other procedure or specialties should be with approval from the board and with public hearings and public notice.

If you have any questions, please feel free to contact me.

Thank you,



Laxmaiah Manchikanti, MD

Medical Director

Pain Management Centers of Paducah and Marion

Ambulatory Surgery Center

Pain Care Surgery Center

Clinical Professor

Anesthesiology and Perioperative Medicine

University of Louisville, Kentucky

Chairman of the Board and Chief Executive Officer, ASIPP and SIPMS

2831 Lone Oak Road
Paducah, KY 42003

Phone: 270-554-8373 ext. 101

Fax: 270-554-8987

E-mail: drm@asipp.org

LM/den

To view some of Dr. Manchikanti's publications go to:

<http://www.ncbi.nlm.nih.gov/sites/entrez?cmd=search&db=pubmed&term=manchikanti>

“The most entrenched conflict of interest in medicine is a disinclination to reverse a previous opinion.”
Yudkin

“There is no limit to what a man can do or where he can go if he doesn't mind who gets the credit.”
Ronald Reagan

Attachment A

COMMERCIAL #1

Dr. Jackson and myself were approached with the idea of creating this group in order to expand the level of not only general orthopedic care, but orthopedic subspecialty care to the region.

The Orthopedic Institute brings a previously unmatched level of service and subspecialty treatment to western Kentucky.

Combined we have countless years of expertise in musculoskeletal subspecialty such as spine, work-related injuries, sports medicine, total joint replacement and trauma.

In our new facility, we'll have a full service rehabilitation center. We'll have X-ray and MRI facilities.

Orthopedic surgery, full rehabilitation services, X-ray and MRI. Everything we do is designed to ensure that our patients have the best possible result.

The Orthopedic Institute of Western Kentucky. Orthopedic excellence close to home.

COMMERCIAL #2

We are the Orthopedic Institute of Western Kentucky, the region's only orthopedic center of excellence. Our team of 7 orthopedic surgeons specialize in multiple areas of orthopedic surgery such as sports medicine, spine, and total joint.

We also offer rehabilitation, full service imaging, and an ambulatory surgery center.

Our fellowship trained orthopedic specialists bring a new level of care to Western Kentucky allowing our patients to receive the excellent care they need. Orthopedic excellence close to home.

COMMERCIAL #3

I enjoy coming to work each day knowing that I have the opportunity to work with other fellowship trained physicians. The Orthopedic Institute of Western Kentucky brings an unmatched level of expertise to the region regarding spine care and advanced surgical techniques.

One of our main goals has been to have a group of physicians that is very well trained and lives and works in the area. Since the inception of the group, we have made it a goal to bring in people who are very well trained.

Our new facility will allow us the opportunity to better serve the patients of Western Kentucky.

Our new building is certainly a testament to our commitment to the area.

There really is no longer a need for patients to have to leave the area to receive whatever care they may need.

This team of doctors is the long-term answer to providing world class spine care to Western Kentucky. Orthopedic excellence close to home.

COMMERCIAL #4

The Orthopedic Institute of Western Kentucky brings an unparalleled level of expertise to the field of total joint replacement and the care of those patients.

I did an extra year of training which is called a fellowship focusing on complex hip and knee problems and joint replacements.

As fellowship trained total joint replacement surgeons, we are able to offer all encompassing innovative care for patients facing joint replacement surgery.

We've committed to building a building. We've committed to growing a practice. Patients no longer have to be shipped out and be separated from their loved ones.

We'll be able to offer our patients complete care at the time of diagnosis is made, their rehabilitation, all the way through to recovery.

The Orthopedic Institute of Western Kentucky. Orthopedic excellence close to home.

Attachment B



THE ORTHOPAEDIC
INSTITUTE
OF WESTERN KENTUCKY

URGENT CARE &
PAIN MANAGEMENT CLINIC

New Location Opening Soon



Attachment C

2012 KENTUCKY AMBULATORY SURGICAL SERVICES REPORT

Ambulatory Operating Room Utilization

ADD Facility	Orthopedic Surgery	Plastic Surgery	ENT Surgery	Ophthalmological Surgery	Urologic Surgery	Gynecological Surgery	Endoscopic Surgery	All Other Surgery	Pain Management in OR	Total Ambulatory Operations (Excluding Pain)
1 PURCHASE										
CALLOWAY										
Murray Calloway County Hospital	630	0	356	615	766	464	692	807	0	4,330
	630	0	356	615	766	464	692	807	0	4,330
FULTON										
Parkway Regional Hospital	278	0	181	106	0	21	163	158	0	907
	278	0	181	106	0	21	163	158	0	907
GRAVES										
Jackson Purchase Medical Center	352	88	293	219	238	157	1,967	657	93	3,971
	352	88	293	219	238	157	1,967	657	93	3,971
MARSHALL										
Marshall County Hospital	87	0	2	0	0	2	1,004	258	0	1,353
	87	0	2	0	0	2	1,004	258	0	1,353
MCCRACKEN										
Ambulatory Surgery Center	123	0	0	847	0	0	0	0	6,779	970
Baptist Health Paducah	1,094	319	1,007	187	518	980	8	1,903	7	6,016
Lourdes Ambulatory Surgery Center	1,097	33	820	683	0	0	0	391	0	3,024
Lourdes Hospital	932	0	233	0	281	331	0	1,556	19	3,333
The Eye And Laser Surgery Center Of Paducah	0	0	0	2,334	0	0	0	0	0	2,334
	3,246	352	2,060	4,051	799	1,311	8	3,850	6,805	15,677
ADD 1 Totals:	4,593	440	2,892	4,991	1,803	1,955	3,834	5,730	6,898	26,238
2 PENNYRILE										
CALDWELL										
Caldwell County Hospital	2	22	37	214	3	1	84	166	0	529
	2	22	37	214	3	1	84	166	0	529
CHRISTIAN										
Jennie Stuart Ambulatory Surgery Campus	994	2	10	471	0	0	77	69	532	1,623
Jennie Stuart Medical Center	994	2	10	471	0	0	1,515	69	532	3,061
	1,988	4	20	942	0	0	1,592	138	1,064	4,684

Attachment D

Ortho Rates with ASC and HOPD 2013 Rates

CPT	DESC	Charge	ASC 2013	HOPD 2013	Percent Reimbursement of charges of ASC	Percent Reimbursement of charges of HOPD
11760	Repair of nail bed	\$ 1,665	\$ 48	\$ 86	3%	5%
20610	Drain/inject joint/bursa	\$ 1,665	\$ 22	\$ 183	1%	11%
20680	Removal of support implant	\$ 4,660	\$ 932	\$ 1,661	20%	36%
20930	Sp bone algrft morsel add-on	\$ 10,406			0%	0%
20931	Sp bone algrft struct add-on	\$ 10,406			0%	0%
20936	Sp bone agrft local add-on	\$ 10,406			0%	0%
20937	Sp bone agrft morsel add-on	\$ 10,406			0%	0%
20938	Sp bone agrft struct add-on	\$ 10,406			0%	0%
22102	Remove part lumbar vertebra	\$ 10,545	\$ 2,109	\$ 3,759	20%	36%
22102	Remove part lumbar vertebra	\$ 7,354	\$ 2,109	\$ 3,759	29%	51%
22103	Remove extra spine segment	\$ 10,545	\$ 2,109	\$ 3,759	20%	36%
22103	Remove extra spine segment	\$ 7,354	\$ 2,109	\$ 3,759	29%	51%
22551	Neck spine fuse&remov bel c2	\$ 17,504		\$ 3,759	0%	21%
22552	Addl neck spine fusion	\$ 13,901			0%	0%
22554	Neck spine fusion	\$ 17,504		\$ 3,759	0%	21%
22585	Additional spinal fusion	\$ 13,901			0%	0%
22610	Thorax spine fusion	\$ 17,504			0%	0%
22612	Lumbar spine fusion	\$ 17,504		\$ 3,759	0%	21%
22614	Spine fusion extra segment	\$ 13,901		\$ 3,759	0%	27%
22630	Lumbar spine fusion	\$ 17,504			0%	0%
22632	Spine fusion extra segment	\$ 3,680			0%	0%
22840	Insert spine fixation device	\$ 12,958			0%	0%
22841	Insert spine fixation device	\$ 12,958			0%	0%
22842	Insert spine fixation device	\$ 12,958			0%	0%
22843	Insert spine fixation device	\$ 12,958			0%	0%
22844	Insert spine fixation device	\$ 12,958			0%	0%
22845	Insert spine fixation device	\$ 12,958			0%	0%
22846	Insert spine fixation device	\$ 12,958			0%	0%
22847	Insert spine fixation device	\$ 12,958			0%	0%
22849	Reinsert spinal fixation	\$ 12,958			0%	0%
22851	Apply spine prosth device	\$ 3,535		\$ 2,307	0%	65%
22852	Remove spine fixation device	\$ 10,217			0%	0%
22855	Remove spine fixation device	\$ 10,217			0%	0%
22899	Spine surgery procedure	\$ 12,958		\$ 2,307	0%	18%
23120	Partial removal collar bone	\$ 6,472	\$ 1,294	\$ 2,307	20%	36%
23130	Remove shoulder bone part	\$ 9,645	\$ 1,929	\$ 3,438	20%	36%
23410	Repair rotator cuff acute	\$ 9,645	\$ 1,929	\$ 3,438	20%	36%
23412	Repair rotator cuff chronic	\$ 9,645	\$ 1,929	\$ 3,438	20%	36%
23430	Repair biceps tendon	\$ 9,645	\$ 1,929	\$ 3,438	20%	36%
23700	Fixation of shoulder	\$ 2,915	\$ 583	\$ 1,039	20%	36%
24359	Repair elbow deb/attch open	\$ 6,472	\$ 1,294	\$ 2,307	20%	36%
25000	Incision of tendon sheath	\$ 4,364	\$ 873	\$ 1,555	20%	36%
25111	Remove wrist tendon lesion	\$ 4,364	\$ 873	\$ 1,555	20%	36%

25310	Transplant forearm tendon	\$ 6,472	\$ 1,294	\$ 2,307	20%	36%
25447	Repair wrist joints	\$ 8,047	\$ 1,609	\$ 2,868	20%	36%
25605	Treat fracture radius/ulna	\$ 1,665	\$ 224	\$ 399	13%	24%
25606	Treat fx distal radial	\$ 5,356	\$ 1,071	\$ 1,909	20%	36%
25607	Treat fx rad extra-articul	\$ 14,141	\$ 2,828	\$ 5,040	20%	36%
26055	Incise finger tendon sheath	\$ 3,326	\$ 665	\$ 1,185	20%	36%
26123	Release palm contracture	\$ 5,797	\$ 1,159	\$ 2,066	20%	36%
26160	Remove tendon sheath lesion	\$ 3,326	\$ 665	\$ 1,185	20%	36%
26418	Repair finger tendon	\$ 3,326	\$ 665	\$ 1,185	20%	36%
26608	Treat metacarpal fracture	\$ 5,356	\$ 1,071	\$ 1,909	20%	36%
26615	Treat metacarpal fracture	\$ 10,560	\$ 2,112	\$ 3,764	20%	36%
26727	Treat finger fracture each	\$ 5,356	\$ 1,071	\$ 1,909	20%	36%
26951	Amputation of finger/thumb	\$ 3,326	\$ 665	\$ 1,185	20%	36%
27570	Fixation of knee joint	\$ 2,915	\$ 583	\$ 1,039	20%	36%
27792	Treatment of ankle fracture	\$ 10,560	\$ 2,112	\$ 3,764	20%	36%
28308	Incision of metatarsal	\$ 4,444	\$ 889	\$ 1,584	20%	36%
29806	Shoulder arthroscopy/surgery	\$ 10,887	\$ 2,177	\$ 3,880	20%	36%
29822	Shoulder arthroscopy/surgery	\$ 5,924	\$ 1,185	\$ 2,112	20%	36%
29823	Shoulder arthroscopy/surgery	\$ 10,887	\$ 2,177	\$ 3,880	20%	36%
29824	Shoulder arthroscopy/surgery	\$ 5,924	\$ 1,185	\$ 2,112	20%	36%
29826	Shoulder arthroscopy/surgery	\$ 5,924	\$ 1,185	\$ 2,112	20%	36%
29827	Arthroscop rotator cuff repr	\$ 10,887	\$ 2,177	\$ 3,880	20%	36%
29828	Arthroscopy biceps tenodesis	\$ 10,887	\$ 2,177	\$ 3,880	20%	36%
29846	Wrist arthroscopy/surgery	\$ 5,924	\$ 1,185	\$ 2,112	20%	36%
29873	Knee arthroscopy/surgery	\$ 5,924	\$ 1,185	\$ 2,112	20%	36%
29875	Knee arthroscopy/surgery	\$ 5,924	\$ 1,185	\$ 2,112	20%	36%
29876	Knee arthroscopy/surgery	\$ 5,924	\$ 1,185	\$ 2,112	20%	36%
29877	Knee arthroscopy/surgery	\$ 5,924	\$ 1,185	\$ 2,112	20%	36%
29880	Knee arthroscopy/surgery	\$ 5,924	\$ 1,185	\$ 2,112	20%	36%
29881	Knee arthroscopy/surgery	\$ 5,924	\$ 1,185	\$ 2,112	20%	36%
29882	Knee arthroscopy/surgery	\$ 5,924	\$ 1,185	\$ 2,112	20%	36%
29888	Knee arthroscopy/surgery	\$ 16,448	\$ 3,290	\$ 5,862	20%	36%
63020	Neck spine disk surgery	\$ 16,142		\$ 3,759	0%	23%
63030	Low back disk surgery	\$ 16,142		\$ 3,759	0%	23%
63035	Spinal disk surgery add-on	\$ 16,142		\$ 3,759	0%	23%
63040	Laminotomy single cervical	\$ 16,142		\$ 3,759	0%	23%
63042	Laminotomy single lumbar	\$ 16,442		\$ 3,759	0%	23%
63043	Laminotomy addl cervical	\$ 8,071			0%	0%
63044	Laminotomy addl lumbar	\$ 17,410			0%	0%
63045	Remove spine lamina 1 crvl	\$ 17,410		\$ 3,759	0%	22%
63046	Remove spine lamina 1 thr	\$ 17,410		\$ 3,759	0%	22%
63047	Remove spine lamina 1 lmbr	\$ 17,410		\$ 3,759	0%	22%
63048	Remove spinal lamina add-on	\$ 17,410		\$ 3,759	0%	22%
63055	Decompress spinal cord thr	\$ 20,301		\$ 3,759	0%	19%
63056	Decompress spinal cord lmbr	\$ 17,410		\$ 3,759	0%	22%
63057	Decompress spine cord add-on	\$ 17,410		\$ 3,759	0%	22%
63075	Neck spine disk surgery	\$ 7,339		\$ 3,759	0%	51%
63076	Neck spine disk surgery	\$ 7,339		\$ 3,759	0%	51%

63081	Remove vert body dcmprn crvl	\$ 19,805			0%	0%
63082	Remove vertebral body add-on	\$ 7,339			0%	0%
63103	Remove vertebral body add-on	\$ 3,718			0%	0%
63650	Implant neuroelectrodes	\$ 17,753	\$ 3,551	\$ 4,400	20%	25%
63650	Implant neuroelectrodes	\$ 22,022	\$ 3,551	\$ 4,400	16%	20%
63655	Implant neuroelectrodes	\$ 29,304	\$ 5,861	\$ 6,792	20%	23%
63655	Implant neuroelectrodes	\$ 11,473	\$ 5,861	\$ 6,792	51%	59%
63685	Insrt/redo spine n generator	\$ 77,157	\$ 15,431	\$ 16,395	20%	21%
63688	Revise/remove neuroreceiver	\$ 14,074	\$ 1,458	\$ 2,598	10%	18%
64415	N block inj brachial plexus	\$ 1,665	\$ 164	\$ 292	10%	18%
64417	N block inj axillary	\$ 1,665	\$ 164	\$ 292	10%	18%
64447	N block inj fem single	\$ 1,665	\$ 48	\$ 292	3%	18%
64450	N block other peripheral	\$ 1,665	\$ 40	\$ 292	2%	18%
64718	Revise ulnar nerve at elbow	\$ 3,773	\$ 755	\$ 1,345	20%	36%
64721	Carpal tunnel surgery	\$ 3,773	\$ 755	\$ 1,345	20%	36%

No payments in ASC – 46 (43%) codes
No payments in HOPD – 26 (24%) codes