

Hi Dr. Abel,

As a follow up, and using the attached source data, below are the numbers through 8, instead of just 1-7. But similar result: about 60 cases/yr, which, if considering over 2 years, and adding 50% for non-private insurance claims, that's 180 total cases. If a 20-case threshold, that leaves at most 9 providers but likely fewer (out of about 35 providers offering care in this age bracket). If 50, then just 3, but in reality, likely none. If you look at the last 2 years of full data, 2022 and 2023, you'll notice that not a single provider administered 20 of these cases over that time. If you add in non-private insurance, then a few would probably meet the threshold, but even fewer than 9, and very unlikely any comes close to 50. If not less than 50, then the pathway is no different than the restriction in the Board's current proposal to which JLCAR objected.

Thanks again, and if there's a good time to talk again, that would be great!

2020

- Total providers billing D9222[®]: 746
- Total D9222[®] cases: 7286

Patient age	Total D9222 [®] : in age bracket	% of total anesthetics	Total providers offering care in age bracket	% total providers
1-8	59	0.81%	32	4.29%

2021

- Total providers billing D9222[®]: 815
- Total D9222[®] cases: 8535

Patient age	Total D9222 [®] : in age bracket	% of total anesthetics	Total providers offering care in age bracket	% total providers
1-8	55	0.64%	32	3.93%

2022

- Total providers billing D9222[®]: 842
- Total D9222[®] cases: 8883

Patient age	Total D9222 [®] : in age bracket	% of total anesthetics	Total providers offering care in age bracket	% total providers
1-8	58	0.65%	33	3.92%

2023

- Total providers billing D9222[®]: 927
- Total D9222[®] cases: 9354

Patient age	Total D9222 [®] : in age bracket	% of total anesthetics	Total providers offering care in age bracket	% total providers
1-8	63	6.74%	36	3.88%

2024 (as of Sept.)

- Total providers billing D9222[®]: 722
- Total D9222[®] cases: 5835

Patient age	Total D9222 [®] : in age bracket	% of total anesthetics	Total providers offering care in age bracket	% total providers
1-8	29	4.97%	14	1.94%

Shaun P. Thomas
Managing Director
Demers, Prasol & Thomas, Inc.
72 No. Main Street, Suite 301
Concord, NH 03301
603-228-1498 (office)
603-493-2844 (mobile)

www.Demers-Prasol.com