

# Medicare Proposes Not to Expand Coverage for Carotid Artery Stenting (CAS) for Patients at Anatomic High Risk for CEA: Public Comments Due August 30, 2008

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## Your Input is Needed to Support Expanded Access to Carotid Artery Stenting (CAS)

### SUMMARY

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On July 31, 2008, the Centers for Medicare and Medicaid Services (CMS) announced a proposal to make no changes to current coverage of percutaneous transluminal angioplasty (PTA) of the carotid artery concurrent with stent placement (CAS). Therefore, Medicare beneficiaries who are at high surgical risk for CEA due to anatomic factors and have either symptomatic carotid artery stenosis of 50-69% or asymptomatic carotid artery stenosis of greater than or equal to 80% will continue to have access to coverage for CAS ONLY through participation in clinical trials or post-approval studies.

In its explanation of its proposed decision, CMS cited the "lower quality and limited quantity of published, peer-reviewed evidence available" addressing CAS for anatomic HR patients. Further details on the proposed coverage policy can be accessed from the CMS website:

<http://www.cms.hhs.gov/MCD/viewdraftdecisionmemo.asp?id=216> .

**The proposed NCD is not final. Medicare is seeking public comment on its proposal by August 30, 2008. This is your only opportunity to publicly comment on this proposal and to provide support for expanded coverage for CAS, an important treatment option for patients who are at high surgical risk for CEA due to anatomical factors that may make CEA an unattractive treatment option.**

### PLEASE SUBMIT COMMENTS: PUBLIC COMMENTS DO IMPACT MEDICARE POLICY

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You, together with Boston Scientific and other parties interested in reversing the proposal to deny anatomical high surgical risk patients with non-study access to potential coverage for CAS, have a special opportunity to comment over the next 30 days.

Boston Scientific will be submitting public comments urging CMS to reconsider its proposed decision and to expand coverage for anatomical high surgical risk patients who are either symptomatic with 50%-69% stenosis or asymptomatic with greater than or equal to 80% stenosis.

We ask that you send CMS your letters commenting on its current proposal and supporting expanded coverage for patients at anatomical high risk for CEA as well.

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- Key elements to include in your comments to CMS are as follows:
  - Emphasize your support of coverage for CAS for patients who are at anatomical high surgical risk for CEA and who are either symptomatic with 50%-69% stenosis or asymptomatic with greater than or equal to 80% stenosis.

Expanding CAS coverage to patient groups for whom surgical intervention is not a recommended alternative would eliminate the requirement for these patients to be enrolled in an FDA-approved study in order to access CAS Medicare coverage.
  - Provide your clinical experience with CAS and your institution's current experiences in caring for the types of patients who are the subjects of this coverage proposal.
  - If you participate in clinical trials or post market studies involving the patient groups being considered for Medicare coverage, please comment on your experience with performing CAS in these populations.

**Please plan to submit comments as soon as possible, but no later than the CMS comment deadline of August 30, 2008.** You can submit comments electronically by emailing an attachment to: [CAGinquiries@cms.hhs.gov](mailto:CAGinquiries@cms.hhs.gov) or by posting via the Internet at: [http://www.cms.hhs.gov/MCD/public\\_comment.asp?nca\\_id=216&basketitem=nca%3A00085R6%3A216%3APer-cutaneous+Transluminal+Angioplasty+%28PTA%29+of+the+Carotid+Artery+Concurrent+with+Stenting%3AOpen%3A6th+Recon%3A3](http://www.cms.hhs.gov/MCD/public_comment.asp?nca_id=216&basketitem=nca%3A00085R6%3A216%3APer-cutaneous+Transluminal+Angioplasty+%28PTA%29+of+the+Carotid+Artery+Concurrent+with+Stenting%3AOpen%3A6th+Recon%3A3) .

At the beginning of your comment, please reference the appropriate file code and issue identifier: "Proposed NCD for Percutaneous Transluminal Angioplasty (PTA) of the Carotid Artery Concurrent with Stenting (CAG-00085R6)". Additional instructions for submitting public comments are available at: [http://www.cms.hhs.gov/InfoExchange/02\\_publiccomments.asp#form](http://www.cms.hhs.gov/InfoExchange/02_publiccomments.asp#form) .

For additional questions, please feel free to contact:

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