September 4, 2012

Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1525-P
P.O. Box 8013
Baltimore, MD 21244-1850

Dear Sirs:

On behalf of the American Society of Diagnostic and Interventional Nephrology, we are writing to comment on File Code CMS-1589-P, the Proposed Rule for Medicare Hospital Outpatient Prospective Payment System and Ambulatory Surgery Center Payment System. The specific section to which we address our comments is section XIV Proposed updates to the ambulatory surgical center (ASC) payment system, subsection C Proposed update to the list of ASC covered surgical procedures and covered ancillary services (Table 39).

We strongly support your proposal that codes 37205 and 37206 be added to the List of Covered ASC Procedures. Stent placement within the dialysis access and draining venous system is used infrequently. However, stents are an important component of optimally treating recurrent stenoses or other complications within the dialysis access circuit — including venous rupture. As such, stent placement is an important adjunct to percutaneous angioplasty which is commonly used to correct abnormalities within dialysis fistulae and grafts. 37205 and 37206 are reimbursed for this purpose in the physician office place of service. These codes should similarly be reimbursed in the Ambulatory Surgery Center. This will allow an ASC to provide cost effective, comprehensive dialysis access services from access placement to maintenance interventions. This will improve patient access to care at lower overall cost. The safety and efficacy of stent placement for these purposes in the non-hospital setting is well established. There may be vascular beds that pose an unacceptable risk for angioplasty and stent placement within the ambulatory surgery center setting. However, those higher risk vessels are specifically excluded from the 37205/37206 descriptors and are given their own CPT codes.

Thank you for adding 37205 and 37206 to the List of Covered ASC Procedures.

Sincerely,

Aris Urbanes, MD
President, ASDIN

Donald Schon, MD
Co-Chair, ASDIN Public Policy Committee