

Individual Comments Template:

As a vascular surgeon, I am concerned with the coverage expansion outlined in CMS' Proposed Decision Memo relating to NCD 20.7. The decision to change coverage is premature and jeopardizes patient safety. I respectfully request that CMS consider the following concerns and recommendations before finalizing any updates to NCD 20.7.

Recommendation 1. *Revise the proposed decision memo to emphasize the collection of real-time data, paired with the continuation of the credentialing process and requirements for reporting standards. These elements are critical for ensuring a high degree of patient safety.*

Recommendation 2. *Mandate utilization of a standardized "Shared Decision Making" tool that would be designed in collaboration with applicable medical specialty societies and/or other relevant stakeholders.*

Recommendation 3. *Revise the proposed decision memo to include a definition for "Qualified Physician" and demonstrated core competency standards relating to PTA of the carotid artery concurrent with stenting. CMS should work with relevant stakeholders to develop the core competency standards.*

Conclusion

I am in agreement with the Society for Vascular Surgery that the coverage expansion in CMS' proposed decision memo regarding NCD20.7 is premature and jeopardizes patient safety. If however the agency moves forward to finalize the proposed expansion of coverage, the finalized memorandum should reflect the outlined recommendations.