



October 25, 2018

Tiffany Swygert  
Director, Division of Outpatient Care  
Centers for Medicare and Medicaid Services  
7500 Security Blvd,  
Baltimore, MD 21244-1850

*Re: New Tech APC Application*

Dear Ms. Swygert,

The Society of Interventional Radiology (SIR) is a professional medical association that represents approximately 7,500 members, including most US physicians who are practicing in the specialty of vascular and interventional radiology. The Society is dedicated to improving public health through pioneering advances in minimally-invasive, image-guided therapies. SIR offers the following comments to CMS regarding Hospital Outpatient Prospective Payment (HOPPS) new technology coverage for hemodialysis access.

The Food and Drug Administration (FDA) recently approved devices (Ellipsys and WavelinQ) for the endovascular creation of an arteriovenous fistula (AVF). SIR believes these new devices provide advantages for hemodialysis patients and supports the creation of a New Technology Ambulatory Payment Classification (APC) designation for these new endovascular AVF systems.

The SIR appreciates the opportunity to provide comments on this issue. If you have any questions or need additional information, please contact Trisha Crishock at [trishacrishock@gmail.com](mailto:trishacrishock@gmail.com) or (703) 934-TCPC.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Victoria Marx".

M. Victoria Marx, MD, FSIR  
SIR President

cc: Sue Sedory

