



**SVS** | Society for  
Vascular Surgery

Sept 9, 2021

The Honorable Chiquita Brooks-LaSure  
Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
7500 Security Boulevard  
Baltimore, MD 21244-1850  
*Submitted electronically to [www.cms.gov](http://www.cms.gov) Medicare Coverage Database*

RE: Proposed decision memorandum to remove Transvenous (Catheter) Pulmonary Embolectomy National Coverage Determination (NCD) (§ 240.6)

Dear Administrator Brooks-LaSure:

The Society of Vascular Surgery (SVS) and the American Venous Forum (AVF) are two of the pre-eminent professional societies in the US, representing surgeons and other practitioners who provide vascular care to CMS recipients throughout the country. Our members regularly provide care for patients with pulmonary embolism as well as diseases in other vascular beds throughout the body.

The SVS and AVF submitted comments to CMS in May 2021 advocating removal of the Transvenous (Catheter) Pulmonary Embolectomy National Coverage Determination (NCD) (§ 240.6). This four decades old non-coverage policy was long out of date. Per your decision memo dated August 11, 2021, we applaud CMS's proposed action to retire NCD 240.6. We agree that "allowing MACs to determine coverage of catheter embolectomy for patients with acute PE is clinically appropriate and in the best interest of our beneficiaries."

We understand that a new National Coverage Decision will not be pursued by CMS at this time given the expected low volume utilization and the lack of large and robust clinical trial data. As coverage decisions will be dealt with at the level of the Medicare Administrative Contractors (MACs) we are happy to work with the MACs in the future should they be interested in pursuing LCDs.

Sincerely,

Mark Iafrati, MD  
Chair, AVF Health Policy Committee

Sunita Srivastava, MD  
Chair, SVS Coding and Reimbursement Committee

cc: David Dolan  
Lee Fleisher  
Elizabeth Richter  
Tamara Syrek