

October 26, 2018

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

Dear Ms. Swygert,

The Society for Vascular Surgery (SVS) is a professional medical society composed of 5,800 specialty-trained vascular surgeons and other medical professionals who are dedicated to the prevention and cure of vascular disease. SVS offers the following comments to CMS regarding Hospital Outpatient Prospective Payment (HOPPS) new technology coverage for hemodialysis access.

The goal of a dialysis vascular access is to provide reliable, repeated access, with minimal complications for patients with chronic kidney disease who need hemodialysis. The Food and Drug Administration (FDA) recently approved two devices for the endovascular creation of an arteriovenous fistula (AVF), the (1) Ellipsys Vascular Access System and (2) WavelinQ EndoAVF System. SVS believes these new devices provide advantages for hemodialysis patients. As such, we support a New Technology Ambulatory Payment Classification (APC) designation for these new endovascular AVF systems.

The SVS 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 or (703) 934-TCPC.

Sincerely,

Michel Makaroun, MD
President
Society for Vascular Surgery

Sean Roddy, MD
Chair, Policy and Advocacy Council
Society for Vascular Surgery

Matthew Sideman, MD
Chair, Coding and Reimbursement Committee
Society for Vascular Surgery