

April 16, 2015

Public Comment – NCD 110.14  
CMS  
DHHS/CMS/OA/CCSQ/CAG/DID  
Baltimore Maryland  
Mail stop: S3-02-01

**Re: Public Comment – NCD 110.14**

Dear CMS 1992 Apheresis NCD Consideration Group,

This letter is written on behalf of the American Society for Apheresis (ASFA), the American Society of Hematology (ASH) and AABB to support the retirement of the 1992 National Coverage Determination (NCD) document.

We believe that the current NCD document is outdated and does not accurately reflect advances in the discipline of Apheresis Medicine and its patient care applications. The current NCD document creates unnecessary confusion for staff of local Medicare contractors and Medicaid programs in their deliberations regarding apheresis coverage determinations for patients needing this extracorporeal therapy. Many well established evidence-based indications for apheresis are not identified in the current document while some approved indications in it are of questionable clinical efficacy and value.

Applying pertinent and focused evidence-based reviews and evaluations at the local contractor level to requests for apheresis intervention determinations, we believe will best serve the interests of patients being considered for this therapy while enhancing their care and safety.

It is hoped that such an approach will also engender more thoughtful, cost effective and scientifically rational applications of apheresis technologies in advancing clinical care. In these regards our societies are willing to work with the CMS to achieve such ends.

Thank you for your considerations in this matter.

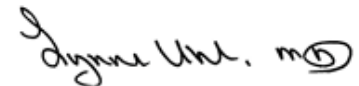
Respectfully,



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