

July 11, 2022

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Provider Appeals Coordinator  
Provider Networks & Contracting Division  
BlueCross BlueShield of Tennessee  
1 Cameron Hill Circle  
Suite 0039  
Chattanooga, TN 37402

**RE: Utilization Management Guidelines for Transcatheter Aortic Valve Replacement**

Dear Provider Appeals Coordinator,

On behalf of the Society for Cardiovascular Angiography and Interventions (SCAI), I am writing to request a formal appeal of recent updates to Transcatheter Aortic Valve Replacement (TAVR) Utilization Management Guidelines (UMGs) for patients insured by BlueCross BlueShield of Tennessee (BC/BS of TN).

On April 30, 2022, BC/BS of TN UMGs added a goal hospitalization length of stay for TAVR specifying patients begin as 23-hour observation. This policy was implemented based only on BC/BS of TN data from January – April 2022. We are deeply concerned that the 23-hour observation criterion for hospitalization length of stay of TAVR is inconsistent with the current standard of care.

The current standard of care for TAVR is at least one overnight stay in the inpatient hospital-care setting. The median length of stay for all TAVR procedures in the Transcatheter Valve Therapy (TVT) registry is two days. TAVR is also currently on the Medicare inpatient only list, requiring the procedure to be billed as an inpatient for Medicare beneficiaries.

23-hour observation (same-day discharge) post-TAVR is rare, clinically inappropriate for most TAVR patients due to patient evaluation needs post-procedure, unsubstantiated by published literature as a standard of practice, not recommended by current clinical practice guidelines, and unsupported by most hospital outpatient department infrastructure.

Additionally, requiring authorization for 23 hour observation also increases physician burden as for most cases, another authorization for the inpatient stay will need to be obtained after the procedure.

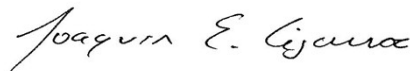
Given the inconsistency with the current standard care and the increased burden this policy will cause, SCAI requests that you reconsider the hospitalization length of stay criterion added to BC/BS of TN TAVR UMGs.

Thank you in advance for your consideration. If you have any questions, require additional information, or would like to schedule a meeting to discuss the issue further, please do not hesitate to contact SCAI's manager of coding and reimbursement, Monica Wright at [mlwright@scai.org](mailto:mlwright@scai.org).

Sincerely,

A handwritten signature in cursive script that reads "Lyndon C. Box".

Lyndon Box, MD, FSCAI  
Government Relations Committee Chair

A handwritten signature in cursive script that reads "Joaquin E. Cigarroa".

Joaquin Cigarroa, MD, MSCAI  
Government Relations Committee Co-Chair