

July 1, 2022

*Officers*

**Sunil V. Rao, MD, FSCAI**  
President  
Noridian Healthcare Solutions  
Medical Directors

*Sent electronically via email*

**George D. Dangas, MD, MSCAI**  
President-Elect  
RE: Local Coverage Articles A59099 and A59048

Dear Medical Directors:

**Timothy D. Henry, MD, MSCAI**  
Immediate Past President  
I am writing on behalf of the Society for Cardiovascular Angiography and Interventions (SCAI) to address Noridian's Future Local Coverage Articles A59099 and A59048 entitled Billing and Coding: Pulmonary Thromboembolectomy.

SCAI has dedicated its work to advancing the profession and is the designated society for guidance, representation, professional recognition, education, and research opportunities for invasive and interventional cardiology professionals. For more than 40 years, SCAI has personified professional excellence and innovation globally, fostering a trusted community of more than 5000 members dedicated to medical advancement and lifesaving care for adults and children with cardiovascular disease.

**James B. Hermiller, MD, MSCAI**  
Vice President  
**Srihari S. Naidu, MD, FSCAI**  
Secretary  
**Arnold Seto, MD, MPA, FSCAI**  
Treasurer  
SCAI disagrees with Noridian's assertion that pulmonary thrombectomy is being billed incorrectly. While catheter-based pulmonary thrombectomy (embolectomy) procedures are performed from a transvenous approach, the actual thrombectomy procedure is performed in the pulmonary artery(ies) and is considered an arterial procedure not a venous procedure. The language in both CPT® and the original CPT® Assistant article state that the codes are reported for the arterial vessel treated not the vessel where the thrombus originated. Since the pulmonary artery is the vessel being treated during this procedure, the arterial code is more appropriate.

*Trustees*

**Mirvat Alasnag, MD, FSCAI**  
**Joaquin E. Cigarroa, MD, FSCAI**  
**Ramesh Daggubati, MD, FSCAI**  
**Thomas E. Fagan, MD, MSCAI**  
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**Alexandra J. Lansky, MD, FSCAI**  
**Binita Shah, MD, FSCAI**  
**Rajesh V. Swaminathan, MD, FSCAI**  
**Molly Szerlip, MD, FSCAI**  
This is the interpretation of the physician community as referenced in the 2020 Medicare Fee-for-Service claims data found in the RUC database, pulmonary embolism is one of the top three diagnoses for the arterial thrombectomy code (CPT® code 37184). Additionally, the physician work component of a pulmonary embolectomy procedure, including amount of time, skill, training and intensity, is much different than a venous thrombectomy, requiring different devices and expertise to remove thrombus from the pulmonary artery system versus a peripheral vein.

*Trustees for Life*

SCAI therefore believes it is inappropriate to link ICD-10 codes for pulmonary embolism to the venous thrombectomy codes. SCAI also disagrees with limiting the medically necessary diagnoses to those pulmonary embolisms with acute cor pulmonale as this guidance does not align with current medical practice.

SCAI respectfully demands that Noridian remove the articles before the proposed effective date. We would be happy to schedule a meeting to discuss this matter further. If you have any questions, please contact SCAI's manager of coding and reimbursement, Monica Wright at [mlwright@scai.org](mailto:mlwright@scai.org) or 202-327-5451.

Sincerely,

Sunil Rao, MD, FSCAI  
President