

Delivered by email

Asuris Northwest Health
Attn: Brady Cass, RHU, MHP
President
528 E. Spokane Falls Blvd, Ste 301
Spokane, WA 99202

**RE: Medicare Advantage Policy M-SUR221
Transcatheter Heart Valve Procedures**

Dear Mr. Cass:

The American College of Cardiology (ACC), the Society for Cardiovascular Angiography and Interventions (SCAI) and the Society of Thoracic Surgeons (STS) have concerns regarding a coding recommendation in your Medicare Advantage Policy M-SUR221 for Transcatheter Heart Valve Procedures. For Valve-in-Valve procedures, the CPT® code the policy advises providers to use is 33999, an unlisted procedure code.

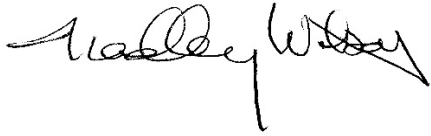
ACC, SCAI and STS would like to point out that the work associated with a valve in valve procedure is virtually identical to the work involved in the native valve transcatheter aortic valve replacement (TAVR) (33361-33366) and transcatheter mitral valve repair (TMVR) (33418-33419) procedures and believe that it is more appropriate to use the TAVR or TMVR CPT® codes for these procedures. In cases where the valve-in-valve procedure makes the case more complex, such as when bioprosthetic valve fracture (BVF) is performed, we recommend that the TAVR or TMVR CPT® code should be billed with a -22 modifier to indicate the additional complexity. We therefore respectfully request that you change your coding guidance regarding coding for these procedures.

If you have any additional questions about this request or would like to set up a meeting to discuss further, please contact Debra Mariani, ACC's associate director, coding and physician

reimbursement at dmariani@acc.org or Monica Wright, SCAI's director, regulatory affairs at mwright@scai.org.

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Hadley Wilson". The signature is fluid and cursive, with a long, sweeping underline.

B. Hadley Wilson, MD, FACC
President
The American College of Cardiology

A handwritten signature in black ink, appearing to read "George Dangas". The signature is cursive and somewhat stylized, with a prominent initial "G".

George Dangas, MD, PhD, MSCAI
President
The Society for Cardiovascular Angiography and Interventions

A handwritten signature in black ink, appearing to read "Thomas E. MacGillivray". The signature is cursive and somewhat stylized, with a prominent initial "T".

Thomas E. MacGillivray, MD
President
The Society of Thoracic Surgeons