



AMERICAN SOCIETY OF HEMATOLOGY

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July 9, 2009

Craig Haug, MD
Medical Director
The National Heritage Insurance Corporation (NHIC)
75 Sgt. William Terry Drive
Hingham, MA 02043

RE: LCD on Erythropoietin Analogs Unrelated to ESRD or Cancer
(DL30258)

Dear Dr. Haug,

The American Society of Hematology (ASH) appreciates this opportunity to review and provide input on NHIC's draft Local Coverage Determination (LCD) on Erythropoietin Analogs Unrelated to ESRD or Cancer (DL30258), currently open for comment. ASH represents over 11,000 hematologists in the United States who are committed to the treatment of blood and blood-related diseases. ASH members include hematologists and hematologist/oncologists who regularly render services to Medicare beneficiaries.

ASH is supportive of NHIC's policy especially as it relates to the treatment of patients with myelodysplastic syndromes (MDS). In response to the publication of numerous Medicare LCDs on ESA treatment in the past few years, ASH brought together experts in the treatment of patients with MDS to develop a model coverage policy that could be used as a reference and to assist ASH members in working with their local MACs and Carriers. The ASH policy titled: "Indications for ESA treatment for Patients with Myelodysplastic Syndromes (MDS)" is attached for your review. As you will see the NHIC LCD is consistent with ASH's model policy. The Society commends you for initiating a policy that will allow for the appropriate treatment of these patients.

Again, thank you for the opportunity to submit these comments. The Society would be happy to discuss these policies with you in greater detail. Please feel free to contact ASH Government Relations Manager Stephanie Kart at 202-776-0544.

Sincerely,

Lawrence A. Solberg Jr, MD, PhD
Chair, Committee on Practice

2009

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