



# AMERICAN SOCIETY OF HEMATOLOGY

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## 2010

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RE: CMS-1504-P: Proposed Changes to the Hospital Outpatient Prospective Payment System and CY 2011 Payment Rates

Dear Administrator Berwick:

The American Society of Hematology (ASH) appreciates the opportunity to comment on the proposed changes to the Hospital Outpatient Prospective Payment System (HOPPS) for 2011. The Society represents more than 16,000 clinicians and scientists committed to the study and treatment of blood and blood-related diseases. ASH members include hematologists who regularly render services to Medicare beneficiaries.

The Society would like to specifically address the ambulatory patient classification (APC) payment for bone marrow and stem cell transplants which are assigned to APC 0112.

### APC for Bone Marrow/Stem Cell Transplantation

In the Society's judgment, the current payment rate for bone marrow/stem cell transplants is grossly inadequate and does not cover all the costs associated with these complex procedures. This may be due to the multiple activities involved – donor search, harvesting, laboratory processing, and transplant – and the fact that these activities take place on different days and sometimes in different facilities. At the February 2010 APC Panel meeting, the Panel recommended that CMS consider creating a composite APC that captures the costs of stem cell acquisition performed in conjunction with recipient transplantation and preparation of tissue. CMS accepted this recommendation and indicated it will report the results of the assessment to the APC Panel at a future meeting. ASH is pleased that CMS is considering establishing a composite APC to more fully capture the costs of this procedure and welcomes the opportunity to assist CMS in this effort.

Thank you again for the opportunity to comment on this proposed rule. If we may provide additional information, you may contact Carol Schwartz, ASH Senior Manager of Policy & Practice, at 202-776-0544 or [cschwartz@hematology.org](mailto:cschwartz@hematology.org).

Sincerely,

Hal Broxmeyer, PhD  
President