



November 18, 2022

Meredith Loveless, MD
CGS Administrators, LLC
Attn: Medical Review
26 Century Blvd., Ste ST610
Nashville, TN 37214-3685

RE: (DL39434) Allogeneic Hematopoietic Cell Transplantation for Primary Refractory or Relapsed Hodgkin's and Non-Hodgkin's Lymphoma with B-cell or T-cell Origin

Dr. Loveless,

The American Society of Hematology (ASH) and the American Society for Transplantation and Cellular Therapy (ASTCT) are very appreciative and are supportive of the CGS proposed draft local coverage determination (LCD), DL39434, Allogeneic Hematopoietic Cell Transplantation for Primary Refractory or Relapsed Hodgkin's and Non-Hodgkin's Lymphoma with B-cell or T-cell Origin.

The Medicare National Coverage Determination (NCD) for Allogeneic Stem Cell Transplantation (110.23) does not specifically include lymphoma as a covered indication, leaving Medicare beneficiaries with lymphoma without access to this potentially curative treatment and creating a different standard of care under Medicare than what is afforded to patients with commercial insurance. For the subset of lymphoma patients who are prime candidates, allo-HCT is their only option for curative intent therapy, making this LCD critically important.

The Societies have reviewed CGS's proposed LCD and appreciate that the language mirrors the language in Palmetto GBA's L39270 on the same topic. ASH and ASTCT believe uniform language will help to avoid regional differences in interpretation.

ASH represents more than 18,000 clinicians and scientists worldwide who are committed to the study and treatment of blood and blood-related diseases. These disorders encompass malignant hematologic disorders such as leukemia, lymphoma, and multiple myeloma, as well as non-malignant conditions such as sickle cell anemia, thalassemia, bone marrow failure, venous thromboembolism, and hemophilia. In addition, hematologists are pioneers in demonstrating the potential of treating various hematologic diseases and continue to be innovators in the field of stem cell biology, regenerative medicine, transfusion medicine, and gene therapy.

The ASTCT is a professional membership association of more than 3,000 physicians, scientists and other health care professionals promoting blood and marrow transplantation and cellular therapy through research, education, scholarly publication, and clinical standards. The clinical teams in our society have been instrumental in developing and implementing clinical care standards and advancing cellular therapy science, including participation in trials that led to current FDA approvals for chimeric antigen receptor T-cell (CAR-T) therapy.

Again, thank you for your efforts to expand coverage for allo-HCT for individuals living with lymphoma where this may be their only option. Should you have questions, please contact Suzy Leous (sleous@hematology.org), ASH's Chief Policy Officer, or Alycia Maloney (amaloney@astct.org), ASTCT's Director of Government Relations.

Sincerely,

A handwritten signature in black ink that reads "Jane Winter, MD." The signature is written in a cursive, flowing style.

Jane N. Winter, MD
ASH President

A handwritten signature in black ink that reads "Brenda Sandmaier, MD." The signature is written in a cursive, flowing style with a long horizontal line extending from the end.

Brenda M. Sandmaier, MD
ASTCT President