

004XM: Oncology (bladder), mRNA, microarray gene expression profiling of 209 genes, utilizing formalin-fixed paraffin-embedded tissue, algorithm reported as molecular subtype (luminal, luminal infiltrated, basal, basal claudin-low, neuroendocrine-like)

Public Comment	Rationale
Gapfill	<ul style="list-style-type: none">• At this time, there is not a comparable assay from a methodology, resource intensity or clinical application perspective that would allow for direct crosswalk• Recent CMS Recommendations support Gapfill for microarray-based testing similar to 004XM<ul style="list-style-type: none">• CMS selected Gapfill for 81542 (004XM's closest comparator) in 2019 "so that the resources used via microarray could be better understood"

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