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Thomas E. Arend Jr.

September 21, 2006

Madeline Ulrich, M.D., M.S.
Michael Lyman, RN, MPH
Coverage and Analysis Group
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, MD

Dear Dr. Ulrich and Mr. Lyman:

The American College of Cardiology (ACC) is pleased to offer comments on CMS' proposed Medicare National Coverage Determination on electrical bioimpedance for cardiac output monitoring (CAG-00001R2). The ACC is a 34,000 member non-profit professional medical society and teaching institution whose mission is to advocate for quality cardiovascular care—through education, research promotion, development and application of standards and guidelines—and to influence health care policy. The College represents more than 90 percent of the cardiologists practicing in the United States.

Members of the ACC's Heart Failure and Transplant Committee and Prevention Committee have reviewed the proposed decision memorandum along with additional comments received from our membership concerning use of thoracic electrical bioimpedance (TEB) in the management of patients with hypertension. We had previously found that the evidence offered for the first reconsideration was not sufficient to support establishment of national Medicare coverage as requested for hypertensive patients on one or more anti-hypertensive drugs who are not at goal blood pressure. At this time, the ACC has not been presented with sufficient evidence to alter this opinion as expressed in our previous comments on this NCA. We therefore support CMS' proposed decision memorandum as written.

Letter to Madeline Ulrich, M.D., M.S. and Michael Lyman, RN, MPH – (cont'd)
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September 23, 2006

The ACC appreciates CMS' willingness to work with the physician community to develop appropriate Medicare coverage policies, and thanks you for this opportunity to comment. If you have any questions, or if we can be of any assistance, please contact Rebecca Kelly, Director of Regulatory Affairs by telephone at 301-493-2398 or by e-mail at rkelly@acc.org.

Sincerely,

A handwritten signature in black ink that reads "Steve Nissen". The signature is written in a cursive, flowing style.

Steven E. Nissen, M.D., F.A.C.C.
President