



February 9, 2025

Centers for Medicare and Medicaid Services
Mail Stop C4-01-26
7500 Security Boulevard
Baltimore, MD 21244

RE: POTENTIALLY MISVALUED CODE CPT 0605T – Inappropriate device cost input assumption

We are submitting this public nomination for revisions to a potentially misvalued code 0605T describing optical coherence tomography (OCT) of retina, remote patient-initiated image capture and transmission to a remote surveillance center unilateral or bilateral; Remote surveillance center technical support, data analysis and reports, with a minimum of 8 daily recordings, each 30 days.

We are making this request as a Medicare accredited digital healthcare provider of this first in class service. The prescribing physicians and their patients in need of remote monitoring of a treatable sight threatening retinal disease currently do not have access to the program because of an undervalued technical component of the diagnostic service. The contractor who priced the service did not appropriately consider the cost of the OCT device provided by the independent diagnostic testing facility (IDTF), resulting in a payment rate inadequate to cover direct operating costs.

The service has been contractor priced by crosswalking to the RVU for the remote physiologic monitoring (RPM) code 99454 (CMS Equipment code EQ392) which is performed with a device that captures simple physiologic data and is valued at only \$1,000. However, the device used to furnish remote OCT performs high-resolution retinal imaging comparable to that performed in the physician office, has a useful life of 5 years, and costs \$40,000 (manufacturer invoice attached).

We also like to point at a methodological misclassification by the contractor in that RPM is a different type of service and belongs to a different benefit category than remote OCT (physician practice E/M service vs. IDTF service). This was the rationale behind establishing dedicated remote OCT codes.

As noted above, remote OCT cannot be furnished at the RPM payment rate. In order to enable Medicare beneficiaries to have access to this important new service, we ask CMS to provide device cost input through physician fee schedule rule making.

Kind regards,

A handwritten signature in blue ink, appearing to read 'K. Nahen', with a stylized, flowing script.

Kester Nahen, PhD
CEO, Notal Vision Inc.

Notal Vision, Ltd.
5 Droyanov St.,
Tel Aviv, Israel



Account name NOTAL VISION LTD
Account details Hapoalim 12Branch 630SWIFT -POALILIT
Account IBAN (RTGS number) IL320126300000000645671
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Swift code POALILIT
Tax Number 512995283

Invoice

BILL TO
Notal Vision Inc.
Notal Vision Inc. 7717 Coppermine Drive Manassas VA
20109 United States
PO # Inc. PO 800 (SO6446) DHL AWB
3895896550

INVOICE # INV118
DATE 6/6/2024
DUE DATE 7/6/2024
TERMS Net 30

Customer Tax
Number
Exchange Rate 3.709

Item Number	Description	Quantity	Unit Price	Amount ILS	Amount
910-0001	SCANLY Home OCT device	5	\$40,000.00	741,800.00	\$200,000.00

SUBTOTAL	\$200,000.00
Discount Item	\$0.00
TAX	\$0.00
TOTAL	\$200,000.00
BALANCE DUE	\$200,000.00