



July 20, 2022

Dear Medical Director,

On behalf of the American Society of Hematology (ASH) and the American Society for Transplantation and Cellular Therapy (ASTCT), we write to formally request the timely creation of a Local Coverage Determination (LCD) to allow Medicare beneficiaries to receive allogeneic hematopoietic cell transplantation (allo-HCT) for primary refractory or relapsed Hodgkin's and Non-Hodgkin's lymphoma with B-cell or T-cell origin for whom there are no other curative intent options. We refer you to the [Palmetto GBA LCD \(DL 39270\)](#) (and the associated article [\(DA59042\)](#)) which is scheduled to be released to final notice on July 22, 2022, and to be fully finalized as effective on September 4, 2022. This LCD is supported by our organizations, and we encourage you to use it as a model.

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 nationally consistent 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 need it, allo-HCT is their only option for curative intent therapy, making this LCD critically important. The scientific evidence included below and attached is recognized by our Societies as demonstrating the effectiveness in general and the comparable success of the procedure regardless of age, providing the justification for this coverage decision.

ASH and ASTCT strongly support Medicare coverage for allo-HCT for individuals with lymphoma. The procedure is widely covered for patients with private insurance and is considered a cost-effective means to treat patients. Our Societies would be happy to help identify lymphoma experts to participate in your Carrier Advisory Council meetings on this topic.

Should you have any questions or if you are in need of lymphoma experts, please contact Katherine Stark ([kstark@hematology.org](mailto:kstark@hematology.org)), ASH's Policy and Practice Manager, or Alycia Maloney ([amaloney@astct.org](mailto: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 Winter, MD  
President, American Society of Hematology  
Professor of Medicine, Hematology and  
Oncology, Northwestern University

A handwritten signature in black ink that reads "Brenda M. Sandmaier, M.D.". The signature is written in a cursive, flowing style.

Brenda M. Sandmaier, M.D.  
President, American Society for Transplantation  
and Cellular Therapy  
Professor, Fred Hutchinson Cancer Center  
Professor of Medicine, University of  
Washington

1. Blood Adv. 2018 Apr 24;2(8):933-940. doi: 10.1182/bloodadvances.2018018531. Outcomes of Medicare-age eligible NHL patients receiving RIC allogeneic transplantation: a CIBMTR analysis. Primary author is Nirav Shah.
2. Biol Blood Marrow Transplant. 2015 Nov;21(11):1863-1869. doi: 10.1016/j.bbmt.2015.07.032. Epub 2015 Aug 7. PMID: 26256941.  
Indications for Autologous and Allogeneic Hematopoietic Cell Transplantation: Guidelines from the American Society for Blood and Marrow Transplantation. Majhail NS, Farnia SH, Carpenter PA, Champlin RE, Crawford S, Marks DI, Omel JL, Orchard PJ, Palmer J, Saber W, Savani BN, Veys PA, Bredeson CN, Giralt SA, LeMaistre CF.
3. Biol Blood Marrow Transplant. 2017 Nov;23(11):1826-1838. doi: 10.1016/j.bbmt.2017.07.027. Epub 2017 Aug 7. Clinical Practice Recommendations on Indication and Timing of Hematopoietic Cell Transplantation in Mature T Cell and NK/T Cell Lymphomas: An International Collaborative Effort on Behalf of the Guidelines Committee of the American Society for Blood and Marrow Transplantation. First author is Mohamed A Kharfan-Dabaja.
4. Indications for Hematopoietic Cell Transplantation and Immune Effector Cell Therapy: Guidelines from the American Society for Transplantation and Cellular Therapy. Kanate AS, Majhail NS, Savani BN, Bredeson C, Champlin RE, Crawford S, Giralt SA, LeMaistre CF, Marks DI, Omel JL, Orchard PJ, Palmer J, Saber W, Veys PA, Carpenter PA, Hamadani M. Biol Blood Marrow Transplant. 2020 Jul;26(7):1247-1256. doi: 10.1016/j.bbmt.2020.03.002. Epub 2020 Mar 9. PMID: 32165328