The Society of Thoracic Radiology (STR) is greatly appreciative of the opportunity to comment on the recently proposed Decision Memorandum for National Coverage Determination (NCD) for Lung Cancer Screening with Low Dose Computed Tomography (CAG-00439N). We applaud the Centers for Medicare and Medicaid's (CMS) proposed decision to extend this life saving benefit to the Medicare age population. STR joins and supports all of the submitted comments of the joint societies, The Lung Cancer Alliance (LCA), The Society of Thoracic Surgeons (STS), and the American College of Radiology (ACR). In this regard, we respectfully request CMS to make targeted modifications to the proposed decision regarding the age bracket for individuals eligible to receive low-dose CT (LDCT) lung cancer screening, the definition of asymptomatic patients, the requirement of provider visits to obtain an order for annual follow-up screening, and the 15-year smoking cessation threshold. Additionally, we agree on the importance of clarifying and strengthening aspects of eligibility criteria for qualifying radiologists and radiology imaging centers, as well as CMS-approved national lung screening data registries. We share the very significant concerns about the proposal to limit this screening benefit to high risk individuals ages 55-74. We strongly believe that a coverage decision excluding those patients who are ages 75-80 years old would neglect a significant patient population at high risk of lung cancer, as well as create a confusing and socially disparate policy that increases rather than decreases health care disparities in the elderly by creating a barrier to lung cancer screening access for lower income, elderly Americans. We consider equitable access to high quality screening the overarching public health priority as CMS develops and implements a safe and effective national coverage policy that will save thousands of lives.

To arrange an interview with an STR spokesperson, please contact Barbara McLeod at 507-288-5620 or barbara@matrixmeetings.com

The mission of the STR is to promote excellence in cardiothoracic imaging and improve patient care through research and education. To learn more about the STR, please visit http://thoracicrad.org

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