



September 12, 2022

Medical Affairs
First Coast Service Options, Inc.
2020 Technology Parkway
Suite 100
Mechanicsburg, PA 17050

Medical Affairs
Novitas Solutions, Inc.
2020 Technology Parkway
Suite 100
Mechanicsburg, PA 17050

Submitted via email to: ProposedLCDComments@fcso.com and ProposedLCDComments@novitas-solutions.com

Re: Proposed Local Coverage Determinations (LCDs) on Nerve Stimulators for Chronic Intractable Pain (DL39406 and DL39404)

To Whom It May Concern:

The American Society of Regional Anesthesia and Pain Medicine (ASRA Pain Medicine) is a voluntary organization representing chronic and acute pain medicine physicians both nationally and internationally. In particular, we are highly dedicated to the use of evidence-based, medical therapies in treating patients with chronic and acute pain when appropriate. Our membership, of over 5,000 practitioners, includes solo practitioners, small group practice members, and practitioners in large private and academic healthcare systems. We write to offer comments on the proposed LCDs referenced above addressing nerve stimulators for chronic intractable pain. In particular, we offer our support for coverage of spinal cord stimulation in the management of painful diabetic neuropathy refractory to conventional medical management.

As noted in the draft LCDs, implantation of spinal cord stimulators has been demonstrated in randomized controlled trials to effectively manage pain associated with painful diabetic peripheral neuropathy (PDPN). Availability of this intervention would, therefore, serve to benefit patients with PDPN who may otherwise not find relief from pain with first-line options for pain management.

We also highlight additional advantages of spinal cord stimulation. To begin, spinal cord stimulation offers non-opioid, non-addictive, and non-medicated treatment to address pain on a long-term basis.

Advancing Evidence-Based Pain Medicine

3 Penn Center West Suite 224, Pittsburgh, PA 15276
Tel. 412.471.2718 U.S. 1.855.795.ASRA PAIN MEDICINE (2772) Fax. 412.471.7503

ASRA Pain Medicine.com

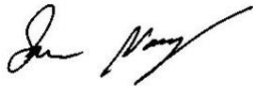
Given the opioid epidemic our nation is currently facing, availability of non-opioid treatment options should be prioritized for the management of pain. Furthermore, we note that current available evidence suggests that other alternative treatments have limited efficacy for the treatment of PDPN, with most resulting in side effects including but not limited to drowsiness and dizziness. Finally, we believe the practice of performing a trial prior to permanent implantation of spinal cord stimulators offers added confidence that the treatment will be effective in the long term.

For these reasons, we support the determination that spinal cord stimulation is medically reasonable and necessary for Chronic Intractable Pain secondary to painful diabetic neuropathy.

* * * * *

ASRA Pain Medicine appreciates your consideration of our comments on the proposed LCDs. If you have any questions about these comments, please do not hesitate to contact Angela Stengel at 412-471-2718 or astengel@asra.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Samer Narouze". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Samer Narouze, MD PhD