December 20, 2017

Ms. Tamara Syrek-Jensen
Director, Coverage and Analysis Group
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 21224

RE: Proposed Decision Memo for Implantable Cardioverter Defibrillators (CAG-00157R4)

Comments submitted electronically via cms.gov

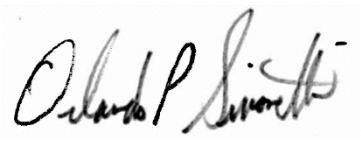
Dear Ms. Syrek-Jensen:

The Society for Cardiovascular Magnetic Resonance (SCMR) appreciates this opportunity to provide feedback to the Centers for Medicare and Medicaid Services (CMS) on the Proposed Decision Memo for Implantable Cardioverter Defibrillators. SCMR is the international professional society representing physicians, scientists, technologists and nurses advocating for research, education and clinical excellence in the use of cardiovascular magnetic resonance.

SCMR supports CMS' intent to add cardiovascular magnetic resonance to the list of diagnostic imaging studies that can evaluate left ventricular ejection fraction (LVEF). We believe rectifying this omission is in the best interest of patients. We also encourage the Agency to review the following literature references which support the use of cardiovascular magnetic resonance to evaluate the presence of ventricular scarring or infiltration as a finding supporting the indication for ICD implantation.

Thank you for your consideration of these comments. If you have questions or require additional information please contact Dr. Orlando Simonetti, SCMR CEO, at orlando.simonetti@osumc.edu.

Sincerely,



Orlando P. Simonetti, PhD
Chief Executive Officer, Society for Cardiovascular Magnetic Resonance
John W. Wolfe Professor in Cardiovascular Research
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The Ohio State University

Literature:

1. Jablonowski R, Chaudhry U, van der Pals J, Engblom H, Arheden H, Heiberg E, Wu KC, Borgquist R, Carlsson M. Cardiovascular Magnetic Resonance to Predict Appropriate Implantable Cardioverter Defibrillator Therapy in Ischemic and Nonischemic Cardiomyopathy Patients Using Late Gadolinium Enhancement Border Zone: Comparison of Four Analysis Methods. *Circ Cardiovasc Imaging*. 2017;10:e006105.

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4. Neilan TG, Farhad H, Mayrhofer T, Shah RV, Dodson JA, Abbasi SA, Danik SB, Verdini DJ, Tokuda M, Tedrow UB, Jerosch-Herold M, Hoffmann U, Ghoshhajra BB, Stevenson WG, Kwong RY. Late Gadolinium Enhancement Among Survivors of Sudden Cardiac Arrest. *JACC: Cardiovasc Img*. 2015;8:414–423.

5. Chan RH, Maron BJ, Olivotto I, Pencina MJ, Assenza GE, Haas T, Lesser JR, Gruner C, Crean AM, Rakowski H, Udelson JE, Rowin E, Lombardi M, Cecchi F, Tomberli B, Spirito P, Formisano F, Biagini E, Rapezzi C, De Cecco CN, Autore C, Cook EF, Hong SN, Gibson CM, Manning WJ, Appelbaum E, Maron MS. Prognostic Value of Quantitative Contrast-Enhanced Cardiovascular Magnetic Resonance for the Evaluation of Sudden Death Risk in Patients With Hypertrophic Cardiomyopathy. *Circulation*. 2014;130:484–495.