June 12, 2020

Meredith Loveless, MD
2 Vantage Way
Nashville, TN 37228
cmd.inquiry@cgsadmin.com

RE: MolDX: Liquid Biopsies for Solid Organ Transplantation DL38582

Dear Dr. Loveless,

On behalf of the Association for Molecular Pathology (AMP) and the College of American Pathologists (CAP), we thank you for the opportunity to review and comment on the proposed policy for MolDX: Liquid Biopsies for Solid Organ Transplantation DL38582.

The AMP is an international medical and professional association representing approximately 2,500 physicians, doctoral scientists, and medical technologists who perform or are involved with laboratory testing based on knowledge derived from molecular biology, genetics, and genomics. Membership includes professionals from academic medicine, hospital-based and private clinical laboratories, the government and the in vitro diagnostics industry.

The CAP is the world's largest organization of board-certified pathologists and leading provider of laboratory accreditation and proficiency testing programs. The CAP serves patients, pathologists, and the public by fostering and advocating excellence in the practice of pathology and laboratory medicine worldwide.

We are submitting joint comments because currently both our organizations share the same position regard this draft LCD.

Both AMP and CAP commend CGS for recognizing the role of plasma-based molecular diagnostic methods that help monitor solid organ transplant and provide information to help optimize immunosuppressive therapy in post-transplant Medicare beneficiaries. The coverage limitations outlined in the proposed policy is reasonable based on the current evidence.

While we agree with the proposed policy as outlined, we request that CGS consider making the following changes.

1. The term "liquid biopsy" is not a precise terminology that lends itself to application in a medical policy. While definitions vary on the precise meaning of this term, it can broadly be thought of as collection of a body fluid sample to test for relevant biomarkers to inform patient management. It is most commonly applied to the collection of peripheral blood for analysis of cell-free circulating tumor deoxyribonucleic acids (DNA).

The term cell free DNA is also not specific enough as it may be variously derived: for allograft rejection tests the target of interest is "donor derived cell free DNA" or ddcfDNA; for fetal (birth) defect screening in maternal blood the target is "fetal cell free DNA" and for tumors, the target is usually described as "circulating tumor DNA."

Recommend: Please amend the term "liquid biopsy" to read "**donor derived cell free DNA**" as a more precise term that is more suitable for a medical policy and avoid referring to these tests as liquid biopsies or circulating tumor cell tests.

2. The last bullet in the coverage criteria states that a test must successfully complete a technical assessment that will ensure that analytical and clinical validity criteria are met to establish the test as reasonable and necessary. The Molecular Diagnostic Services (MolDX) Technical Assessment (TA) has been a well-established requirement of the MolDX program since 2011. Since that time, laboratory developed tests or tests with undefined or unproven clinical utility have had to undergo a TA to ensure coverage. The TA process is detailed on the CGS website, which applies to all molecular diagnostic tests covered under MolDX. Therefore, we do not think it is necessary, nor is an LCD the appropriate place, to mention this requirement.

Recommend: Remove the requirement that a test must successfully complete a TA, as redundant and unnecessary.

Thank you again for the opportunity to review and comment on this proposed policy. We are happy to be of assistance in providing additional clinical or other information to assist you with this draft LCD. Please direct your correspondence to either Tara Burke, Director of Public Policy, at tburke@amp.org or Nonda Wilson, CAP's Manager, Economic and Regulatory Affairs, at nwilson@cap.org

Sincerely,

Association for Molecular Pathology
College of America Pathologists