



August 28, 2026

Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

RE: National Coverage Analysis (NCA) 110.23
Autologous Stem Cell Transplant (AuSCT) for Multiple Myeloma (MM)

Submitted electronically

Addendum to initial comments

The Association for Molecular Pathology (AMP) and the College of American Pathologists (CAP) welcome the opportunity to clarify our comments submitted to CMS on August 25, regarding the National Coverage Analysis for Autologous Stem Cell Transplantation for Multiple Myeloma (CAG-00444R2).

The joint comments submitted by AMP and CAP support modernizing the autologous stem cell transplantation (AuSCT) staging framework for eligible patients with multiple myeloma (MM). The comments were not intended to restrict coverage based on a specific disease stage or to create ambiguity or coverage gaps for patients with Stage I disease. The AMP and CAP reaffirm their recommendation that the National Coverage Analysis (NCA) language include the International Staging System (ISS) and its revised frameworks. We also strongly support updating the NCD to reflect current clinical practice and to ensure that AuSCT coverage remains available to otherwise eligible patients at every ISS stage, including Stage I.

Thank you for the opportunity to clarify our earlier comments of August 25.

Sincerely,

Association for Molecular Pathology
College of American Pathologists