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RE: Non-Covered Services for Cervical Disc Arthroplasty

Dr. Drs. Hecker and Lurvey,

The American Association of Neurological Surgeons (AANS) and Congress of Neurological Surgeons (CNS) appreciate the opportunity to comment upon the recently reviewed Draft LCD on Non-Covered Services that was discussed at the May 14, 2014, California Carrier Advisory Committee (CAC).

The AANS and CNS believe the proposed non-coverage for cervical disc arthroplasty [22856 Total disc arthroplasty (artificial disc), anterior approach, including discectomy with end plate preparation (includes osteophylectomy for nerve root or spinal cord decompression and microdissection), single interspace, cervical, 22861 Revision including replacement of total disc arthroplasty (artificial disc), anterior approach, single interspace; cervical] is incorrect and should be reconsidered.

The National Coverage Decision cited by the LCD, NCD 150.10 [National Coverage Determination (NCD) for Lumbar Artificial Disc Replacement (LADR) (150.10)], applies only to lumbar total disc arthroplasty. A NCD pertaining to **lumbar** arthroplasty should not inform coverage decisions for **cervical** disc arthroplasty.

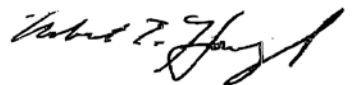
The data supporting cervical disc arthroplasty is much more robust. A recent Cochrane review reports comparable clinical outcomes between cervical arthrodesis and cervical arthroplasty patients, with the caveat that long-term (greater than five year) follow-up will be necessary to determine whether motion preservation produces superior clinical outcomes.

This and select other cervical arthroplasty articles are included in this packet. A PubMed search with "cervical spine arthroplasty" as keywords conducted June 16, 2014 returned 547 articles. We have attempted to extract a representative sample of this robust literature, concentrating upon recent reports. We trust this will provide a representative sample of the cervical arthroplasty literature.

Finally, we would also bring to the attention of the CAC that cervical arthroplasty is now a covered service through TRICARE, with 22856 recently removed from the "No Government Pay Procedure Code List" maintained as part of the TRICARE Policy Manual.

Thank you for the opportunity to provide this input to the CAC process. Should you have any questions related to this matter, please feel free to contact us.

Sincerely,



Robert E. Harbaugh, MD, President
American Association of Neurological Surgeons



Daniel K. Resnick, MD, President
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John K. Ratliff, MD
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