



Oncology Nursing Society

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Palmetto GBA
Part A Policy and Part B Policy
Columbia, SC 29202

Submitted via email: A.Policy@PalmettoGBA.com and B.Policy@PalmettoGBA.com

RE: Scalp Cooling for the Prevention of Chemotherapy-Induced Alopecia (DL39573)

Oncology nurses are privileged to support people with cancer through their entire cancer experience, whether that is through treatment and into survivorship or as they face their end-of-life journey. Today, the Oncology Nursing Society writes to share its **strong support for proposed coverage of scalp hypothermia devices for the prevention of chemotherapy-induced alopecia (CIA)**. We agree that these devices are reasonable and necessary for patients with solid tumors, which is aligned with our belief that all patients should have equal access to management and mitigation strategies for toxicities of their cancer-related treatments, including alopecia. This proposed coverage policy, if finalized as drafted, will continue to realize that aim.

We applaud Palmetto for being the first Medicare Administrative Contractor (MAC) to propose coverage for scalp cooling, thus paving the way for broader access to this important technology for cancer patients. The associated local coverage article highlights recent coding that has been established for this service (HCPCS codes 0062T and 0063T), and we note that the Centers for Medicare and Medicaid Services (CMS) continues to confirm payment for these codes as part of its CY 2024 Outpatient Prospective Payment System (OPPS). We wish to ensure scalp cooling is also paid under the Medicare Physician Fee Schedule (PFS), and that Palmetto establishes fair and reasonable pricing for these codes. This will continue to improve access to scalp hypothermia, thus reducing disparities related to socioeconomic status for this intervention.

Thank you for considering our comments. If you have any questions or would like to discuss these comments in more detail, please contact Alec Stone, ONS Director of Government Affairs, at astone@ons.org.

Sincerely,

The Oncology Nursing Society

About ONS

The Oncology Nursing Society (ONS) is a professional organization of over 39,000 registered nurses and other healthcare providers dedicated to excellence in patient care, education, research, and administration in oncology nursing. ONS members are a diverse group of professionals who represent a variety of professional roles, practice settings, and subspecialty practice areas. Oncology nurses are leaders in the healthcare arena, committed to continuous learning and leading the transformation of cancer care by advocating for high-quality care for people with cancer.