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Prevent Blindness is the nation's leading nonprofit, voluntary organization committed to protecting and expanding access to sight-saving care for patients of all ages who live with a multitude of diseases, conditions, and circumstances that may affect their eye health or impair vision. We write in response to a recently finalized local coverage determination (LCD) issued by five out of seven Medicare Administrative Contractors (MACs) that, if implemented, will severely compromise access to Micro-Invasive Glaucoma Surgery (MIGS).

As we understand, while the MACs did open the proposed LCDs to the public for comment, the finalized version contains several criteria for coverage that were not included in the proposed LCDs; thus, disallowing the public to fully review and offer feedback. The resulting LCD for glaucoma includes treatment restrictions that are not evidence-based or medically sound, and will result in unnecessary vision loss, patient treatment burden, and reduced quality of life. **Prevent Blindness is requesting that the Centers for Medicare and Medicaid Services (CMS) ask that the MACs withdraw these policies and to allow for a reopening of a public notice and comment period to ensure that glaucoma patients, professionals, and other stakeholders can weigh in on the full scope of the draft LCD, and provide evidence-based, clinical guidelines on coverage decisions for MIGS.**

Glaucoma is a very serious, irreversible sight-threatening disease that, according to [the Centers for Disease Control and Prevention](https://www.cdc.gov/diseasecontrolandprevention/) (CDC), affects more than 3 million Americans and affecting black Americans 6 times more frequently than white Americans. The CDC also projects that glaucoma rates will more than double by 2050, with over half of glaucoma patients being Hispanic. With these troubling trends, access to innovative procedures such as MIGS can mean the difference between living a life with healthy vision or needless vision loss.

The recent LCD decisions by the five MACs – namely, WPS Insurance Corporation, CGS Administrators, National Government Services, Noridian Healthcare Solutions, and Palmetto GBA— is particularly concerning for vulnerable patient populations that have higher rates of glaucoma and blindness, including Blacks, Hispanics, and low-income patients. Patients with glaucoma need access to a range of surgical procedures reflecting their individual anatomical and disease features with varied levels of intraocular pressure (IOP) targets for disease stability. Unfortunately, the finalized policies released by the MACs do not recognize the need for glaucoma treatment to be tailored to the individual patient. As an organization dedicated to advocating for patient-centered care, we are highly troubled by the inability for patients to receive the care that is determined between their eye care provider and themselves to be in their best medical and health interests.

Once again, we urge CMS to take available steps to keep this troubling wave of LCDs from taking effect and to call for the reopening of a public notice and comment period to allow for full



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consideration of LCDs for MIGS. Thank you for your consideration of this request. Please contact Sara D. Brown at sbrown@preventblindness.org or (312) 363-6031 if you have any questions.

Sincerely,

Jeff Todd
President and CEO
Prevent Blindness