

February 23, 2009

Ms. Gina Oliveri  
National Government Services, Inc.  
P.O. Box 2019  
Milwaukee, WI 53201-2019  
[Gina.Oliveri@ugswlp.com](mailto:Gina.Oliveri@ugswlp.com)

Dear Ms. Oliveri:

On behalf of the members of the American Clinical Laboratory Association (ACLA), I am filing the attached comments on the draft local coverage decision (LCD) for Vitamin D Assay Testing. ACLA is an association representing national, regional and local laboratories, many of which provide services to Medicare beneficiaries and are located in states within the jurisdiction of National Government Services, Inc (NGS). I am sending the original by US mail.

We believe the draft LCD would unduly limit coverage for medically necessary Vitamin D testing services. Our submission expands the "Indications and Limitations of Coverage and/or Medical Necessity" section of the draft LCD, adds additional indications for measurement of vitamin D levels and includes a list of medical documentation to support the narrative. Our submission also includes a list of what we believe should be covered ICD-9 codes with descriptors and medical documentation to support each covered code.

Thank you for your consideration of our comments. We would like the opportunity to meet with you and others at NGS to discuss our response and concerns with you, and I will be following up with your office. In the meantime, if you have any questions, please do not hesitate to contact me at 202-637-9466 or by email at [glisson@clinical-labs.org](mailto:glisson@clinical-labs.org).

Sincerely,



JoAnne Glisson  
Vice President

Attachments

- (1) Vitamin D Indications and Limitations of Coverage
- (2) ICDs and Supporting References