

Wound Care Manufacturers

November 10, 2019

Dr. Ryan Holzmacher
WPSIC
1717 W. Broadway
PO Box 1787
Madison, WI 53701-1787

Submitted electronically to policycomments@wpsic.com

Re: WPS Draft Wound Care LCD DL 37228

Dear Dr. Holzmacher;

On behalf of the Coalition of Wound Care Manufacturers (“Coalition”), I am submitting comments on the Draft Local Coverage Determination for Wound Care (DL37228). The Coalition represents leading manufacturers of wound care products used by Medicare beneficiaries for the treatment of chronic wounds including but not limited to surgical dressings, pneumatic compression devices and Negative Pressure Wound Therapy (NPWT).

Our comments address solely the issue of Negative Pressure Wound Therapy that is contained in this draft LCD. In the utilization parameter section of the LCD, the language states, “Negative pressure wound therapy services should not exceed a 120 day period. There should be no more than 4 dressing changes per wound per month for the majority of wounds.” However, this seems to conflict with the DMEMAC LCD that states: “Coverage is provided up to a maximum of 15 dressing kits (A6550) per wound per month.

We question the rationale that WPS is using to include NPWT in its policy since this is clearly within the jurisdiction of the DMEMACs and their LCDs. This is not only confusing to our members but also the clinicians who use NPWT in their practices. Thus, we recommend that WPS eliminate the information on NPWT in this draft LCD and refer providers to the DMEMAC NPWT LCD.

The Coalition appreciates WPS’s consideration of these comments and would be pleased to answer any questions related to this matter.

Sincerely,



Karen Ravitz, JD
Health Care Policy Advisor