

Wound Care Manufacturers

August 25, 2014

Dr. Antonietta Sculimbrene
Medical Director □
Part A/HHH Policy □
PO Box 100238
AG-275 □
Columbia, SC 29202-3238

Electronically Submitted to J11A.Policy@PalmettoGBA.com

Re: Debridement of Wounds (DL 35415)

Dear Dr. Sculimbrene:

On behalf of the Coalition of Wound Care Manufacturers (“Coalition”), I am pleased to submit the following comments in response to the Palmetto draft LCD on Debridement of Wounds (DL 35415). The Coalition represents leading manufacturers of wound care products used by Medicare beneficiaries for the treatment of wounds.

The Coalition believes that the draft LCD is well done; however, there is some language contained in the policy that is inconsistent with clinical practice that we request is corrected prior to the final release of the Palmetto policy. The Coalition is a member of the Alliance of Wound Care Stakeholders. We are aware that they submitted comments on the clinical inaccuracies in this draft policy. We support their comments and request that Palmetto implement their recommendations prior to this policy becoming final. Specifically,

* Delete the sentence in the “Coverage Indications, Limitations, and/or Medical Necessity” section of the policy that states, “Debridement techniques usually progress from non- selective to selective to surgical but can be combined.” This is not clinically or medically accurate. □ * Delete the sentence in the documentation section of the policy that reads, “***There should be a statement if any viable tissue was removed; and if so, then there should be a quantification of the surface area, volume, or dimensions of the viable tissue removed.***” There is no possible way to accurately quantify the surface area, volume, or dimensions of the viable tissue removed during a debridement.

Furthermore, the Coalition requests that the codes included in this draft policy should be the same as those identified in the currently active Part B policy. As such, the Coalition recommends that prior to this draft policy becoming final, Palmetto revise the list of codes to ensure that all of the ICD-9-CM codes listed in the current Part B policy are identified in this Part A LCD. The list included in the current Part B LCD is more accurate.

In addition, the Coalition recommends that both the Part A and Part B policies have the following ICD-9-CM codes added in:

730:10-730:19	Chronic Osteomyelitis site unspecified – chronic osteomyelitis involving multiple sites
459:11	Postphlebotic syndrome with ulcer
997.69	Other late amputation stump complication

By adding these codes, Palmetto is providing a more comprehensive policy that includes a full list of clinical conditions applicable for debridement.

On behalf of the Coalition of Wound Care Manufacturers, we appreciate the opportunity to submit these comments. If you have any questions or would like further information, please do not hesitate to contact me.

Sincerely,



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