

Wound Care Manufacturers

SUMMARY OF COMMENTS AT MAY 21, 2015 CMS HCPCS PUBLIC MEETING AGENDA ITEM #15 ATTACHMENT 15.090

I am Marcia Nusgart and serve as the executive director for the Coalition of Wound Care Manufacturers. While the manufacturer of this product is not a member of the Coalition, the Coalition represents leading manufacturers of wound care products used by Medicare beneficiaries for the treatment of wounds including those products that are subject to this agenda item. The companies pay a membership fee in order to belong to the Coalition.

The Coalition questions the preliminary coding decision for this agenda item. We have had a long history since 2006 working with CMS and the DMEMAC (then DMERC) medical directors to establish both unique HCPCS codes and coverage criteria for antimicrobial wound care dressings. Even though we have advocated at HCPCS public meetings in 2008 and 2009 for unique HCPCS codes for these products and conducting educational meetings with the DMERCs addressing clinical evidence for coverage of these products, we recognize that in the surgical dressing policy articles over the years, there have not been unique coding for antimicrobials (and in this case silver) but instead surgical dressings containing them have been coded based on the clinically predominant component such as an alginate, hydrocolloid, etc.

Therefore, we were surprised to read the preliminary coding decision for this product. We agree that perhaps there might not have been a national program operating need identified by Medicare, Medicaid or the Private Insurance sector to establish a unique code(s) to identify application of dressings that are predominantly silver. However, with that being the case, the CMS HCPCS Workgroup would have historically then given it an already existing code according to the clinically predominant component or even a new HCPCS code. We are concerned that this guidance was not given by the Workgroup and is a divergence from previous decisions

Considering how antimicrobial wound care dressings have been coded in the past, we question why there was not given a code (either new or already existing) by the CMS HCPCS Workgroup? Since we understand that CMS is making every attempt to make the HCPCS coding process a transparent one, we would request an explanation for the rationale in the preliminary coding decision especially if there is a change in how antimicrobial products are now or will be coded in the future. This can be provided on the CMS HCPCS website.

If there is no change, then we would request that the CMS HCPCS Workgroup revisit its preliminary coding decision and assign either a new HCPCS code or assign existing HCPCS codes based on the substrate component in recognition of the surgical dressing policy articles over the years.