



Email sent on October 4, 2018 –

To WPS Medicare Policy Comments

Thank you for your response dated August 30. My apologies for our delayed response, however it has taken me a bit of time to provide your response to my members and obtain their feedback on the rationale you provided. My members are still confused. WPS covered these codes up until April 16, 2018. You mentioned that “WPS GHA did not inadvertently leave those codes out when publishing the new A55909 Wound Care Coding Companion for Wound Care L37228” and “WPS GHA CMD’s medical determination/decision was to not include those codes as they did not support the main purpose of the new A55909 Wound Care Coding Companion for Wound Care L37228”. However, in making this coverage determination, WPS eliminated coverage yet did not provide any of the evidence that WPS reviewed which resulted in this determination. In order to have a more transparent process, the 21<sup>st</sup> Century Cures Act requires MACs to provide the evidence utilized in making coverage decisions and in this case in eliminating coverage. WPS has not provided that information. While we are happy to provide evidence to support the reinstatement of these codes, we would like to request the evidence reviewed to eliminate coverage for those patients that require extensive debridement for open wounds (CPT code 97597) when the tissue severity is limited to breakdown of skin. This LCD is for debridement of all wounds requiring debridement. Open wounds (CPT code 97597) may require debridement as do other deeper ulcers (CPT codes 11042, 11043, 11044) that are refractory to healing and those that have complicated healing cycles so we are confused as to why these codes -when tissue severity is limited to breakdown of skin - did not support the main purpose of the LCD.

As mentioned, based on the 21<sup>st</sup> Century Cures language, we request the literature that WPS reviewed to eliminate coverage of the codes identified in my previous email. Once we receive it, we will be happy to follow up with additional literature for your review.

Thank you so much. I look forward to receiving the information.

Karen Ravitz, J.D.  
Health Policy Advisor  
Alliance of Wound Care Stakeholders



