



December 10, 2015

Virginia Muir
LCD Comments
P.O. Box 7108
Indianapolis, IN 46207-7108

Electronically Submitted to PartBLCDComments@anthem.com

Re: Debridement of Wounds (DL 33614)

Dear Ms. Muir:

On behalf of the Alliance of Wound Care Stakeholders (“Alliance”), I am pleased to submit the following comments in response to the NGS draft LCD on Debridement of Wounds (DL 33614). The Alliance is a nonprofit multidisciplinary trade association of health care professional organizations whose mission is to promote quality care and access to products and services for people with wounds through effective advocacy and educational outreach in the regulatory, legislative, and public arenas. Our clinical specialty societies and organizations not only possess expert knowledge in complex chronic wounds, but also in wound care research. A list of our members can be found at www.woundcarestakeholders.org.

The Alliance believes that the draft is generally well done; however, we do have a concern regarding NGS’s decision to base coverage for debridement on the size of the wound. Within the policy, NGS states,

Most very small wounds do not require selective debridement. Ulcers that may require selective debridement are typically larger than 2 x 2 cm. Wounds with tunneling, regardless of size, may require selective debridement.

The Alliance questions how NGS has determined the 2 x 2 cm wound size? This appears to be an arbitrary determination. Debridement of wounds are medically necessary with necrotic/devitalized tissue. The Alliance maintains that debridement should not be based on size or depth of a wound.

As such, the Alliance recommends eliminating the reference to wound size

On behalf of the Alliance of Wound Care Stakeholders, 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,

Marcia Nusgart R.Ph.

Marcia Nusgart R.Ph.
Executive Director