



SUBMITTED VIA EMAIL on 12.18.17

From: [Marcia Nusgart](#)

To: "[Peter Gurk](#)"; "[Fred Mamuya](#)"; "[STACEY BRENNAN](#)"; "[ROBERT.HOOVER](#) "; "[Paul Hughes](#)"

Subject: The further need to post information contained in DMEMAC response in DMEMAC Advisory or revised LCD update on our request?

Date: Monday, December 18, 2017 12:34:00 PM

Dear Drs. Gurk, Mamuya, Brennan, Hoover and Hughes—

I am following up on the status of including information contained in the October 20th clarifying letter to the Alliance of Wound Care Stakeholders on the surgical dressing policy in a DMEMAC Advisory or revised LCD. This is even more important now since there was incorrect information related in a 11/30/17 Noridian surgical dressing educational seminar. With all due respect, this was after I asked Dr. Gurk in an 11/19/17 email to ensure that “the information that was included in the Alliance clarification letters is included in both of the educational workshops. It would definitely clarify these issues and a good method of publically educating your constituents on them.”

Dr. Gurk very graciously responded by stating that I can reassure you that the Noridian Provider Outreach and Education (POE) staff that are conducting the educational sessions are well versed and prepared to answer questions on the Surgical Dressings LCD, including the information that the DMDs had sent to you previously.

Unfortunately, this was not the case as stated in one of our member’s letter to the Noridian staff who presented the seminar:

“Thanks again for presenting the surgical dressing webinar last week, however I wanted to share some feedback with you. This is in regards to the second webinar you presented on Thursday. Some of the information you provided about collagen coverage was incorrect. Please see the attached October 20th letter from the DMEMACs to the Alliance of Wound Care Stakeholders. In this letter the DME MAC directors clarify that collagen is covered for 3 wound types: 1) full thickness, 2) wound with light to moderate exudate, 3)wound that have stalled or not progressed to healing.

In the webinar you said there are two types of wounds, you said 1) full thickness with light to mod exudate, 2) wounds that have stalled or not progressed to healing. The letter also talks about the utilization guidelines, and underlines the fact that collagen dressings have change frequencies that may vary from as little as once per day to once per seven days depending on wound characteristics. Change frequencies is determined by the clinical needs of the wound. During the webinar you said that ‘dressings can stay in place for up to 7 days’ without any further explanation.

This is confusing information, especially because a lot of billers were on the call and have seen the letter from the DME MACs. The Alliance of Wound Care Stakeholders was reassured that the webinars were supposed to align with the ‘clarification letter’ however that didn’t happen. Let me know what your thoughts are.

While I received a very gracious call from Dr. Gurk (thank you again!) apologizing for the situation and advising me that he shared the October 20th letter with the staff person who will then rework her written and oral presentation for the next educational session; however, as stated by our member above, this doesn't help those who heard the incorrect information on November 30, 2017 or even those who have not seen this information in a public forum.

While we believed it was important for you to place this information in a DMEMAC Advisory or revised LCD when I sent the written request in November, it is even more critical now! I am sure this is an issue that all of us would like to resolve and move on—therefore, I would urge you to publish this information as soon as possible.

Thank you so much for your consideration.

Sincerely,

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SUBMITTED VIA EMAIL on 11.13.17

From: Marcia Nusgart
Sent: Monday, November 13, 2017 10:22 AM
To: 'Peter Gurk'
Cc: Fred Mamuya; Stacey Brennan; Robert Hoover; Paul Hughes
Subject: Request to post information contained in DMEMAC response in DMEMAC Advisory or revised LCD

Dear Dr. Gurk;
Thank you for the response to our September 11, 2017 letter- it is very helpful and does clarify the situations. As we discussed when we spoke last month, in order for the entire public to see these clarifications, the Alliance requests that this information be published in the next DMEMAC advisory or in a revised Surgical Dressing LCD. I would hope that this could be easy to do and it would be so helpful and add clarity to this LCD.

We appreciate your consideration of this request.

Sincerely,

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