

Marcia Nusgart's remarks as a 5 minute speaker
Agenda item #3 on December 1, 2021

Requests: Dayspring Lite - HCP210903LPG21; Dayspring - HCP210903PMKF3,
Dayspring - HCP210903WBEG8

Dayspring Lite - HCP210903LPG21

- Request to revise existing HCPCS Level II code E0651.
- Existing Code E0651: Pneumatic compressor, segmental home model without calibrated gradient pressure.
- Applicant's suggested language: "Compressor, segmental home model without calibrated gradient pressure, or Pneumatic and non-pneumatic compressor, segmental home model without calibrated gradient pressure."

Dayspring - HCP210903PMKF3

- Request to revise existing HCPCS Level II code E0667, "Segmental pneumatic appliance for use with pneumatic compressor, full leg."
- Applicant's suggested language: "Segmental appliance for use with compressor, full leg, or Segmental pneumatic and non-pneumatic appliance for use with pneumatic and non-pneumatic compressor, full leg."

Dayspring - HCP210903WBEG8

- Request to revise existing HCPCS Level II code E0669, "Segmental pneumatic appliance for use with pneumatic compressor, half leg."
- Applicant's suggested language: "Segmental appliance for use with compressor, half leg, or Segmental pneumatic and non-pneumatic appliance for use with pneumatic and non-pneumatic compressor, half leg."

My name is Marcia Nusgart and I am the Executive Director of the Alliance of Wound Care Stakeholders, a nonprofit multidisciplinary trade association representing physician specialty societies, clinical and patient associations whose mission is to promote quality care and access to products and services for people with wounds and lymphedema.

I am here speaking today to support the CMS HCPCS Workgroup's preliminary coding decision to establish three new Level II HCPCS codes:

- "Non-pneumatic compression controller without calibrated gradient pressure."
- "Non-pneumatic sequential compression garment, full leg."
- "Non-pneumatic sequential compression garment, half leg."

While the Alliance does not receive any financial compensation from the applicant of this request, other companies who manufacture pneumatic compression devices are members of the Alliance of Wound Care Stakeholders and pay a membership fee.

Including disparate devices into the same HCPCS code would severely limit the ability of CMS and other interested parties to collect data and assess the utilization, cost, efficacy and clinical outcomes of these new devices. Therefore, we are in agreement with the creation of three new K codes since it will allow CMS to establish appropriate product segmentation thereby avoiding issues related to data collection and analysis.

We appreciate the opportunity to speak at this public meeting and are happy to answer any questions.