Comments on Draft LCD for Pneumatic Compression Devices

presented by

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Wound Care
Stakeholders

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Alliance of Wound Care Stakeholders

- 501(c)6 multidisciplinary trade association
- 19 physician, clinician and patient organizations
- Mission is to promote quality care and patient access to wound care products and services through effective advocacy and educational outreach in regulatory, legislative and public arenas
- www.woundcarestakeholders.org



Alliance of Wound Care Stakeholders Clinical Members

- American Academy of Wound Management
- American College of Certified Wound Specialists
- American College of Hyperbaric Medicine
- American College of Foot & Ankle Surgeons
- American College of Phlebology
- American College of Surgeons
- American Diabetes Association, Foot Council
- American Dietetic Association
- American Physical Therapy Association
- American Podiatric Medical Association



Alliance of Wound Care Stakeholders Clinical Members

- American Professional Wound Care Association
- American Venous Forum
- Association for the Advancement of Wound Care
- Dermatology Nurses Association
- National Association for Home Care and Hospice
- Society for Vascular Medicine
- Society for Vascular Surgery
- Undersea & Hyperbaric Medical Society
- Wound Healing Society



New coverage: chest/trunk garments

- The Alliance supports the addition of coverage of appliances for the treatment of lymphedema that extends into the chest, trunk and/or abdomen.
- This represents significant progress in the understanding of lymphedema and the need for comprehensive, effective treatment.

Exclusion of Podiatrists and other Providers to prescribe PCDs

- Concern scope of practice for podiatrists is determined by licensing boards in each state; Prescribing PCDs is within the scope of practice
- Concern why DME MACs believe Podiatrists and other Providers should not prescribe PCDs?
- Podiatrists are trained to recognize and treat CHF and kidney disease [contraindications for PCDs]

Exclusion of Podiatrists and other Providers to prescribe PCDs-Recommendations

"Prescriptions for PCDs used to treat lymphedema or chronic venous insufficiency with ulceration (EO650-E0652) are limited to providers enrolled in Medicare, licensed to utilize PCDs within their scope of practice and authorized by Medicare to prescribe as "physicians."



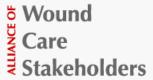
Coverage for lymphedema secondary to CVI must be maintained

- Concerns
 - CVI/Lymphedema criteria should not require presence of ulcers
 - Draft LCD's assertion that only "mild" lymphedema occurs secondary to CVI is inaccurate
 - Moderate to severe lymphedema/CVI can occur without wounds and requires treatment



Concern: NCD vs. LCD Discrepancy in CVI coverage

- NCD states pumps are covered for "treatment of CVI" when patient has non-healing ulcers
- Draft LCD states pumps are covered for "treatment of secondary lymphedema caused by CVI...when patient has non-healing ulcers
- Draft LCD is more restrictive than NCD
 - Access to pumps <u>must not be denied</u> to patients with CVI and ulcers but no lymphedema



Alliance Recommendations

- > CVI should be covered when:
 - Patient has 6 months non-healing venous ulcers that have not responded to conservative treatment

Patient has lymphedema secondary to CVI and physician determines still has significant symptoms after a 4-week trial of conservative therapy

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Alliance Recommendations (cont.)

- Lymphedema diagnosis in CVI patients must be confirmed by criteria established by clinical experts
 - Accomplishes goal of providing prescribing guidance
 - Avert orders for patients with CVI only



Restore E0652 coverage after failure of E0651 or E0650

- Draft LCD eliminates previous coverage
- > Recommendations:
 - □ Coverage criteria should be developed to allow for E0652 device for patients who:
 - Have lymphedema confined to the limb and
 - Had at least a 4-week trial of E0651 or E0650 device and it was ineffective
 - □ Patients <u>must have some access</u> to the next level of pneumatic therapy when a simple pump failed to treat the lymphedema

Summary

Alliance will submit written comments and requests consideration of our recommendations

Alliance welcomes opportunity to serve as a resource to the DME MAC medical directors in developing clinical criteria to confirm lymphedema diagnosis in CVI patients and to answer any questions.