

# Comments on Draft LCD for Pneumatic Compression Devices

*presented by*

Marcia Nusgart R.Ph.  
Executive Director

DME MAC Open Meeting  
August 30, 2011

# 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](http://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 must not be denied 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

# 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 must have some access 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.