



March 9, 2017

Novitas Solutions
Medical Policy Department
Union Trust Building
Suite 600
501 Grant Street
Pittsburgh, PA 15219-4407

Submitted Electronically to DraftLCDComments@Novitas-solutions.com

RE: Draft LCD – Treatment of Varicose Veins of the Lower Extremities (DL34924)

Dear Dr. Patterson,

On behalf of the Alliance of Wound Care Stakeholders (“Alliance”), we are pleased to submit the following comments in response to the Novitas draft LCD on Treatment of Varicose Veins of the Lower Extremities (DL34924). The Alliance is a nonprofit multidisciplinary trade association of physician medical specialty societies and clinical associations 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. These comments were written with the advice of Alliance clinical specialty societies and organizations that not only possess expert knowledge in complex chronic wounds as well as chronic venous disease. A list of our members can be found at www.woundcarestakeholders.org.

It is our understanding that three of our members: the American College of Phlebology, American Venous Forum and the Society of Vascular Surgeons are submitting extensive comments on this draft LCD. We are in agreement with their concerns of the draft LCD in that:

- Some of these proposed changes have no foundation in medical evidence and arbitrarily limit access to care for patients with clinically significant disease, with the potential for serious patient health consequences.
- They are a significant departure from prior Novitas LCDs and other Medicare Administrative Contactors (MACs) as well as most commercial insurance carriers.
- Language used in the policy leads to some confusion as to what the policy is stating.
- While aware of these societies’ clinical practice guidelines, Novitas applied them in a selective fashion and have chosen to ignore some important recommendations made within them.

Given the significant concerns the Alliance members have about this draft LCD, we submit that Novitas withdraw this proposed policy and reach out to the Alliance physician specialty societies who treat patients with chronic venous disease to develop a coverage policy that is based on scientific evidence and the already existing clinical practice guidelines.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Marcia Nusgart R.Ph." The signature is written in a cursive style with a large initial 'M' and a long, sweeping underline.

Marcia Nusgart R.Ph.
Executive Director