



February 14, 2014

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Designated Federal Official,
HOP Panel
CMS/CMM/HAPG/DOC
7500 Security Blvd.,
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Baltimore, MD 21244-1850

The Alliance of Wound Care Stakeholders is a nonprofit multidisciplinary trade association of health care professional and patient organizations 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. Our members are clinical specialty societies and organizations that not only possess expert knowledge in complex chronic wounds, but also in wound care research. These clinicians treat patients with wounds in all settings – including the hospital outpatient arena. A list of our members can be found on our website: (www.woundcarestakeholders.org).

The Alliance respectfully requests that the Panel recommend to CMS a reassignment of disposable negative pressure wound therapy (NPWT) G codes into different APC codes and specifically from APC 0016 (Level IV Debridement & Destruction) to APC 0186 (Level III Skin Repair).

CMS created G codes for reporting disposable NPWT services on January 1, 2013, and assigned these services to APC 0016 (Level IV Debridement & Destruction). While some of the services contained within APC 0016 do involve wound care, we believe APC 0135 (Level III Skin Repair) would be a more appropriate grouping for these services. (This APC was proposed to be renumbered in 2014 to APC 0186, but for the purposes of this letter we will refer to this APC as APC 0135.) The G codes and their descriptors are shown below.

G0456 Negative pressure wound therapy, (e. g. vacuum assisted drainage collection using a mechanically-powered device, not durable medical equipment, including provision of cartridge and dressing(s), topical application(s), wound assessment, and instructions for ongoing care, per session; total wound(s) surface area less than or equal to 50 square centimeters

G0457 Negative pressure wound therapy, (e. g. vacuum assisted drainage collection) using a mechanically-powered device, not durable medical equipment, including provision of cartridge and dressing(s), topical application(s), wound assessment, and instructions for ongoing care, per session; total wound(s) surface area greater than 50 square centimeter

Reasons Supporting Reassignment of Disposable NPWT G codes from APC 0016 to APC 0135 (Level III Skin Repair)

There are several strong reasons for reclassifying the disposable NPWT G codes to APC 0135 (Level III Skin Repair).

The reclassification would group disposable NPWT with similar wound care codes describing treatment of complicated wounds (CPT codes 13100, 13101) and cleaning and preparing viable wound surfaces for substitute skin grafting (CPT codes 15002, 15003). APC 0135 also includes a procedure for closing split wounds (CPT code 12020), a service which similarly matches the healing objective of disposable NPWT.

The costs for disposable NPWT equipment have been under-calculated for HCPCS G0456/G0457 through placement into APC 0016. This APC band results in a loss to the facility and will likely reduce access to mechanical NPWT for Medicare patients. APC 0135 has a geometric mean payment which would be more applicable to the total cost of the average equipment and the service provided. Please see the table below for national average pricing data on disposable NPWT used in conjunction with G- 0456/7.

CPT	Work RVU Facility/Office	PE RVU	MP RVU	Total RVU	APC FEE 2013
Complicated wound and skin graft prep and closing split wounds					
13100	3.07/6.03	2.51	0.45	6.03/8.99	APC 0135 \$393.38
13101	3.05/7.21	3.32	0.52	6.89/11.05	APC 0135 \$393.38
15002	3.65/5.57	2.28	0.62	6.55/8.47	APC 0135 \$393.38
12020	2.67/5.03	2.40	0.40	5.47/7.83	APC 0135 \$393.38
Disposable NPWT placement – including the device					
G0456 < 50 cm					APC 0016 \$209.65
G0457 > 50 cm					APC 0016 \$209.65

Placement of DME NPWT					
97605 < 50 cm	0.55/0.57	0.14	0.08	0.77/0.79	APC 0013 \$71.54
97606 > 50 cm	0.60/0.63	0.15	0.10	0.85/ 0.88	APC 0015 \$106.98

In addition, the title of APC 0135 (Level III Skin Repair) accurately captures the wound treatment and healing aspects of disposable NPWT. The reassignment would support CMS policy objectives of organizing families of similar procedures and services into clinically homogenous APCs. This contrasts with the current APC assignment of the G codes, which are now mapped to APC 0016 (Level IV Debridement and Destruction). This APC contains codes describing destruction of skin lesions, removal of foreign bodies, and debriding subcutaneous tissue. While APC 0016 broadly relates to skin care, its procedures are more related to extraction, ablation and removal of foreign bodies, as opposed to the healing and wound repairing nature of disposable NPWT. Disposable NPWT are devices that treat different types of wounds using various energy sources to remove exudate and promote healing, which aligns more with the wound care services contained in APC 0135.

The Alliance requests that the Panel recommend that CMS reclassify the G codes describing disposable NPWT to APC 0135 (Level III Skin Repair), as this would better align these services with an APC containing similar services and consuming comparable resources.

We appreciate the opportunity to offer our comments. We are happy to provide any additional information.

Sincerely,



Marcia Nusgart R.Ph.
Executive Director