



April 15, 2015

Stacey Brennan, MD
National Government Services Inc.
P.O. Box 6036
Indianapolis, Indiana 46206-6036

Robert D. Hoover, Jr., MD,
CGS
Two Vantage Way
Nashville, TN 37228

Fred Mamuya, MD
NHIC Corp
75 Sgt. William B. Terry Drive
Hingham, MA 02043

Eileen M. Moynihan, MD
Noridian, LLC
PO Box 6747
Fargo, ND 58108-6747

Paul J. Hughes, MD
Pricing, Data Analysis and Coding
PO Box 6757
Fargo ND 58108-6757

Dear Drs. Brennan, Hoover, Mamuya, Moynihan and Hughes,

On behalf of the Alliance of Wound Care Stakeholders (“Alliance”), I am checking on the status of our concerns related the January 22nd DME MAC Correct Coding Article for Surgical Dressings Containing Non-Covered Components and the subsequent decision by the PDAC.

We submitted a letter to you on February 24 in which we requested that the PDAC immediately reverse its decision classifying dressings containing medical grade honey as non covered. Furthermore, we requested the DMEMACs rescind their Correct Coding Article as it contains changes to the current policy – significant enough to warrant public notice and comment.

To date, we do not believe that either were done, nor was any response provided to us on our letter. We have contacted one of the companies that manufacture these products and it informed us that an appeal has been submitted. Our concern is that since an appeal is pending, why are the codes and coverage for this product not continuing to be in place until the appeal has been resolved? We believe that neither CMS, or its contractors, have demonstrated accountability on this matter.

The changes that were made did not follow appropriate procedures as they were material and significant changes in coding and coverage policy. It has negatively impacted how our clinical members treat their patients. It has not only negatively impacted patient care it has created a financial burden to the Medicare beneficiaries that our clinical members treat.

None of the clinical associations that we represent were afforded the right to offer comments prior to this change being implemented. Thus, the change has caused a disruption in care for the Medicare beneficiaries that our clinical association members treat, and the Medicare system and its patients have incurred unnecessary expenses.

We urge the PDAC to immediately reverse its decision classifying dressings containing medical grade honey as non-covered. Furthermore, we urge the DMEMACs to rescind their Correct Coding Article as it contains significant changes to the current policy without the ability for us to provide comment.

We look forward to hearing from you on this very important matter.

Sincerely,

A handwritten signature in cursive script that reads "Marcia Nusgart R. Ph.".

Marcia Nusgart, R.Ph
Executive Director

Cc: Laurence Wilson
Liz Richter