



Practice Pointers

Health Policy and Practice Resources for APMA Members

Surgical Dressings LCD Updates

In September 2017, the DME MACs issued a significant update on the Surgical Dressing Policy Local Coverage Determination (LCD) (L33831).

<https://www.cms.gov/medicare-coverage-database/details/lcd-details.aspx?LCDId=33831&ver=14>

This policy covers products familiar to podiatrists including hydrogel, foam and collagen dressings. Based on several changes, APMA, in consultation with the DME Workgroup and Health Policy and Practice Committee, provides you some key concerns and considerations when dispensing surgical dressings.

1) Dressings of mixed components

Those dressings with many components were previously difficult to categorize. The new policy defines the category of product based on the majority weight component. For example, if a product is > 50% Hydrogel by weight, no matter the other ingredients, the product is considered a hydrogel.

APMA encourages you to consider one cautionary note about Hydrogel products. There are some products previously categorized as Hydrogels; however, many of these contain >50% medicinal honey and thus they are now considered "Honey" Dressings. Since honey dressings do not qualify for Medicare reimbursement, those products with >50% medicinal honey (by weight) are now considered non-covered by Medicare.

2) Wound Depth

The overall requirements of qualified wounds and "medical necessity" are largely intact from the previous policy, although wound depth requirements (partial, full, etc.) have been removed for specific products (e.g.

collagen). However, documentation of medical necessity, "qualified" wounds and other policy requirements remain largely unchanged. For example, we still feel the use of collagen dressings on a fresh post matrixectomy and/or any surgical site healing spontaneously within a normal post operative course does not meet the overall requirements of medical necessity inherent to the Surgical Dressings policy.

3) Collagen dressings (A6021-A6024)

Collagen dressings (A6021-A6024) must be PDAC approved. If a specific collagen product is not listed on the PDAC DMECS listserv they should be considered non-covered.

4) Foam dressings

Foam dressings are not indicated for partial thickness wounds. Multiple dermatopathologists have previously commented that chemical and laser matrixectomy sites are not full thickness and that chemical and laser matrixectomies ablate epidermal tissue. Based on their findings, it is the opinion of this committee that foam dressings are not reimbursable for typical, fresh post matrixectomy sites under the Medicare Surgical Dressings Policy.

5) Overall Policy Requirements

The surgical dressings policy is quite comprehensive. APMA suggests that podiatrists dispensing surgical dressings carefully review the policy and understand the comprehensive nature of the documentation requirements prior to dispensing any products described in this policy.

For additional information, contact APMA at healthpolicy.hpp@apma.org.