

A Collaboration Webinar presented by the A/B and DME Medicare Administrative Contractors

November 16, 2021

















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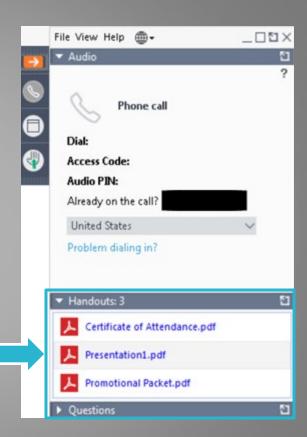
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## **Participants**

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- National Government Services: <a href="http://ngsmedicare.com/">http://ngsmedicare.com/</a>
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- WPS Government Health Administrators: <a href="https://www.wpsgha.com/">https://www.wpsgha.com/</a>

## **TODAY'S PRESENTATION**

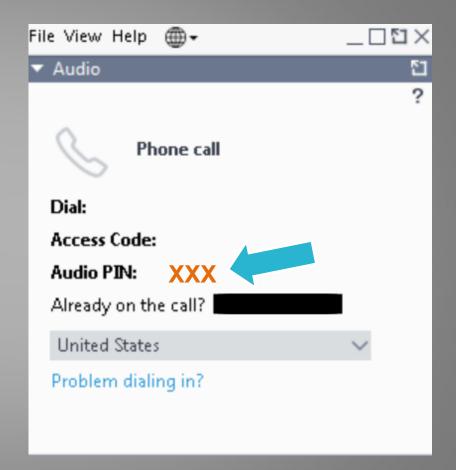
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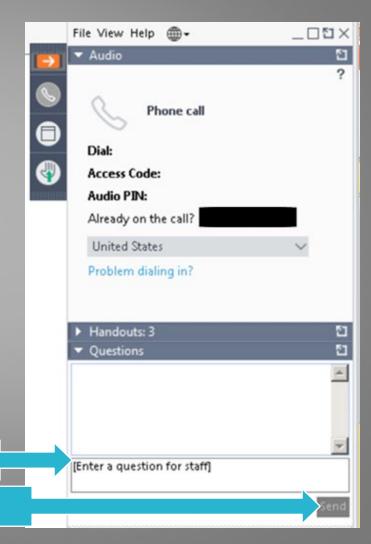


## **QUESTION BOX**

Type it here.

Hit send.

To ask a question in the question box . . .



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## Agenda

- Coverage Criteria
- Documentation Requirements
- Policy Specific Documentation Requirements
- Examples
- Dressing Types and HCPCS
- Resources
- Questions



## **Qualifying Wound**

### Surgical Procedure

Caused or treated by surgical procedure

### Debridement

- Surgical
- Mechanical
- Chemical
- Autolytic
- In either case, treatment must be performed by treating practitioner or other healthcare professional.

## **Coverage Criteria**

### Dressings should be appropriate for size of wound

- Pad size usually 2 in. greater than wound size
  - Except alginate should be closer to wound size
- Convert cm to inches (2.54 cm = 1 inch)

### • Quantity and type dependent on:

Current wound status, likelihood of change, recent dressing use

### Kits

Components must meet definition of a surgical dressing for coverage

## **Qualifying Dressing Requirements**

### **Primary Dressings**

Therapeutic or protective coverings applied directly to wounds or lesions on the skin or caused by an opening under skin.

### **Secondary Dressings**

Materials that serve therapeutic or protective function that are needed to secure primary dressings.



# **Documentation** Requirements

## Standard Documentation Requirements

- Standard Written Order (SWO)
- Medical Records
- Proof of Delivery
- Beneficiary Authorization
- Continued Use
- Continued Need
- Refill Requirements
  - Items dispensed on a periodic basis

## **Documentation Responsibilities**

### Clinician and Supplier

SWO: Must be signed/dated by Clinician
Can be supplier generated

### Clinician

- Medical Record Documentation
  - Clinical justification of choice of dressing
  - Wound description (exudate, size, debridement type, etc.)
  - Continued Need
  - Continued Use

### Supplier

- Continued Use
- Refill Requirements
- Proof of Delivery

## Standard Written Order (SWO) Elements

#### SWO elements

- Beneficiary's name or Medicare Beneficiary Identifier (MBI)
- Order Date
- General description of the item
- Quantity to be dispensed, if applicable
- Treating practitioner name or National Provider Identifier (NPI)
- Treating practitioner's signature

When the prescribing practitioner is also the supplier, and is permitted to furnish specific items, a separate order is not required; however, the medical record must still contain all of the required order elements.

## When is a New Order Required?

- For all claims for purchase or initial rentals
- Change in order
- When indicated in the medical policy (surgical dressings = every 3 months)
- Replacement
- Change in supplier
  - If new supplier is unable to obtain valid order and documentation from original supplier



# **Policy Specific Documentation** Requirements

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### Order

- New order needed when
  - New dressing is added
  - Quantity increased
  - Every 3 months for each dressing being used

### **Medical Records**

- Practitioner, nursing home, or home care records
  - Source of information and date obtained
- Define number of wounds, reason for dressing, and if primary/secondary
- Demonstrate reasonable and necessary requirements
- Kept on file for 7 years (after date of service)

# Medical Record Documentation: Initial Wound Evaluation

- The treating practitioner's medical record, nursing home, or home care nursing records must specify:
  - The type of qualifying wound
  - Location, number, and size of qualifying wounds being treated with a dressing
  - Whether the dressing is being used as a primary or secondary dressing or for some non-covered use (e.g., wound cleansing)
  - Amount of drainage
  - Type of dressing (e.g., hydrocolloid wound cover, hydrogel wound filler, etc.)
  - Size of the dressing (if appropriate)
  - Number/amount to be used at one time (if more than one)
  - Frequency of dressing change
  - Any other relevant clinical information

# Medical Record Documentation: Weekly or Monthly Wound Evaluations

- Must be updated by the treating practitioner (or their designee) on a monthly basis.
- Evaluation required unless documentation in the medical record which justifies why an evaluation could not be done within this timeframe and what other monitoring methods were used to evaluate the beneficiary's need for ongoing use of dressings.
- Expected on a weekly basis for beneficiaries in a nursing facility or for beneficiaries with heavily draining or infected wounds.
- May be performed by a nurse, treating practitioner or other health care professional involved in the regular care of the beneficiary. This evaluation must include:
  - The type of each wound (e.g., surgical wound, pressure ulcer, burn, etc.),
  - Wound(s) location,
  - Wound size (length x width) and depth,
  - Amount of drainage, and
  - Any other relevant wound status information.
  - This information must be available upon request



# **Documentation Examples**

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## Example #1

			,		
Wound 2 (CRN/9868852)		Corder Date		Bioburden	Collagen Powder (1g) (Madline) x1 QD
L. lower extremity posterior		1/10/2018 ( Moder			2. Petrolatum Gauze (3x9)(Medline) x1 QD
Thickness	Etlology/ICD	167.332 - L97.221	She (Lx W cm.) Depth		<ol> <li>Gauze Pad ABO (5x9) (Medline) x1 QD</li> </ol>
Full Thickness	Venous Leg L	Jicer	9.00 x 7.30 2.0		4. Gauze Roll - Bulkee (4.5")(Medline)   x1   SHR
Tunneling (cm)	Undernining (cm)	Debridement	Whirtpool	Frequency	5.
None	None	Autolytic	N		6.
Prescribed topical medication o	rdered by the doctor		7	requency	7.
None		and the same of th			3.
Justification Item 1: Qty s	shipped - 30: , Item 2: Qty	shipped - 30: , Item 3: Odysh	hpped • 30: , Item 4: City s	лирреа - V:	

The order indicates that there is "moderate" drainage, however the notes on the next slide do not agree.

## Example #1 (cont.)

Medical record from office visit on 2/7/2018 – contradicting drainage compared to evaluation

"There is scant amount of SS drainage noted..."

Mid ship: There is I open area measuring 0.9x1.0x<0.2cm. Wound had is 100% epithelial tissue. There is a scant amount of SS drainage sound.

Lateral calf: 6 areas are noted which all have 100% epithelial tissue in the wound beds.

Posterior Calf: 6 open areas within a 9.5X3 Som area. 5 areas with 100% epithelial rissue in the wound bed. 1 area with 70% slough, 30% epithelial tissue. There is scant SS drainage noted

Skip to buttocks is intact,

Nutrological: Awake, stert.

Psychiatric: Pleasant, calm and cooperative with exam.

"There is scant SS drainage noted..."

## Example #1 (cont.)

### Medical record from office visit on 1/31/2018

"There is scant amount of SS drainage noted..."

#### assembly Tolling Interest Date

#### Skim:

Mid shin: There are 15 scattered areas on the mid shin, 4 wounds are open while the test are scabbed. The large, open wound treasures 2.5x2.0X<0.2cm. All visible wound beds are healthy in appearance. 100% epithelial tissue. There is a small amount of \$\$\$ drainous possit.

Posterior Call: 9.5X9cm with 19 scattered areas. All wound beds are healthy in appearance, 100% epithelial tissue. There is scant 58 drainnee noted thin AM. Peri wound tissue is pink and tender with no increased warmth. I area of 80% slough in the

"There is scant SS drainage noted..."

## Example #2

### "Exudate: Dry"

	Current	Clinical Information				Products	Mult FOC
Wound 1 (CRM9791315)		Order Date Exudate	)	Bloburd	m (1.	SAdr Brd Adh 4x4 (Sorbion)	x1 QD
R. outer foot		10/18/2017 ( Dry )		i N	2	Collagen Powder (1g)	x1 QD
Thickness	Étiology/ICD	L89 890	Size (L x W cm.)	Depth	3.		
Full Thickness	Pressure Ulce	er - Unstageable	0.20 x 0.50	0.2	4.		The state of the s
Tunneling (cm)	Undermining (cm)	Debridement	Whin	pool Frequen	cy 5.	And and a second of the second	
None	None	Autolytic	l N		6.	AND ALL THE PROPERTY OF THE PARTY OF THE PAR	maran di sami da sama
Prescribed topical medicatio	ordered by the doctor	mente endre abra mada en de la secona na casa de d	en anemanna con en en en en en en en	Frequency	7		
silvadene				QD		Markins And will all for execution angular areas and in execution	
Justification Item 1: Q	y shipped - 30: , Item 2. Oty	shipped - 30: fac. to provide:	silvadene	NO DESCRIPTION OF THE PROPERTY		Characterisation and American Security (American Se	remove condensation for the same
1875	- particular contract						

Not reasonable and necessary on dry or minimally exudative wounds

Also, medical notes call for Silvasorb gel and bordered gauze w/no mention of alginate or collagen powder; and, practitioner called for M/W/F change, not daily.

## Example #3

Wound 1 R. buttock	*	Date Onset 9/14/2017	Assesment Date 11/30/2017	Exudate Moderate	
Thickness Full Thickness	Etiology/ICD Pressure Ulcer - Stage	11	Size (L x W cm.) 1.40 x 1.00	Depth 0.1	Push Score 7.00
Tunneling (cm) None	Undermining (cm) None	Drainage Con Serosanguinou		quisition known	
Periwound/Wound Infection/Critical Co Wound Pain: None Clinical Rationale/Volosure. Adhesive co	1%, Pink/Red; Healthy Granul Edges; Periwound Tissues: Notenization; Localized s/s: Es Nound Comments; Collager Mound for low adherence to tion; Cleanse, apply collager	Macerated; Wound exudate Increase in to donate collager wound bed and occ	Edges/Margins: Epibol to strenthen dermal tis lusive cover. Daily char	y/Rolled ssue toenhance nge due to soilir	
	.,,,				

Skin integrity form says "collagen powder then adhesive composite"

## Example #3 (cont.)

Fr. Mr. M.	Physician		Acres des		A CONTRACTOR OF THE PARTY OF TH	Market Control	
Facility Name		Aller	rgies NK	Ä			
Resident/Patient/Clinis	1	D/Q/B		Med. Rec. No.	Station /DD	11010	Room t
RECEIVED: 11-28-17	1415	Order Read Back	вү	Signature of Receiving Nurse		Ordering Prescriber	
colle		waler R	72	witook	C & NI	Say	uj.
	chanon	ren con	he	a o	boxacc	d ga	uze
AL 14 WELL TO THE	J		40	7		#34°	NC 750

However, the practitioner says "apply collagen powder... then cover with bordered gauze"

Adhesive composite is not mentioned.

### Example #4

Documentation clearly states: "Tissue injury due to trauma" and no mention of debridement.

Thickness	Etiology/ICD9	Size (L x W	cm.) Depth	Push Score
Full Thickness	Tissue Injury due to tra	uma - Full Thickne: 2.20 x 2.70	<0.2	0
Tunneling (cm)	Undermining (cm)	Drainage Consistency	Acquisition	
None	None	Serous	Facility Acquired	

Wound Bed; 100% pink granulation tissue. <u>Periwound</u>; Erythema and maceration. <u>Clinical Rationale/Wound</u> <u>Comments</u>; Three wounds open on 7-28-15; today one wound closed, other twocoalesced. COLLAGEN to attrack fibroblasts, neutrophils and macrophages to promote granulation tissue and angiogenesis; facilitating wound edge contraction and closure. NONBORDERED FOAM to promote thermoregulation; to wick/manage exudate; to provide nontraumatic dressing removal due to fragile skin. DAILY DRESSINGS indicated to ensure dressing integrity, repel contaminants secondary to frequent episodes of incontinence, at least daily; to ensure dressing integrity due to unable to secure with tape, due to fragile skin. <u>Treatment Intervention</u>: Clenase Lt mid-buttock wound with NS or WC, pat dry. Apply skin prep to periwound as tolerated. <u>Apply collagen</u>, cut to size of wound; may double layer. Cover with nonbordered foam, secure with incontinent brief, no tape.

Calls for use of 2 specialty dressings but no medical notes to explain need.



# **Dressing Types**and HCPCS

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## Recommended Frequency

- Depends on type of dressing
- Intervals should be similar for combinations of;
  - Primary dressings
  - Secondary dressings
  - Wound filler
- Product in contact with wound determines frequency
- Needs may change in early phases of treatment
  - Heavily draining wounds
- Normal refill requirements apply (see next slide)

### Refill Requirements

- For all DMEPOS items that are provided on a recurring basis, suppliers are required to have contact with the beneficiary or caregiver/designee prior to dispensing a new supply of items. Suppliers must not deliver refills without a refill request from a beneficiary.
- Contact with the beneficiary or designee regarding refills must take place no sooner than 14 calendar days prior to the delivery/shipping date.
- Supplier must deliver the DMEPOS product no sooner than 10 calendar days prior to the end of usage for the current product.
- Suppliers must not dispense a quantity of supplies exceeding a beneficiary's expected utilization. Suppliers must stay attuned to changed or atypical utilization patterns on the part of their clients. Suppliers must verify with the treating practitioner that any changed or atypical utilization is warranted.
- Regardless of utilization, no more than a month's supply of dressings may be provided at one time, unless there is documentation to support the necessity of greater quantities in the home setting in an individual case.

# Alginate (or other fiber gelling dressing)

### HCPCS Codes A6196 – A6199

- Moderately to highly exudative full thickness wounds and wound cavities (stage III or IV ulcers)
- Up to 1 per/day
- Not reasonable and necessary on dry wounds or wounds covered with eschar
- 1 unit = 6 in. of alginate/fiber gelling dressing rope
- Dressing size = wound size
- Not for use with hydrogels

## **Foam Dressing**

### HCPCS Codes A6209 - A6215

- Full thickness wounds (stage III or IV ulcers)
- Moderate to heavy exudate
- Primary dressing: Change up to 3 times/week
- Secondary dressing: Change up to 3 times/week
  - Wounds with very heavy exudate

## **Collagen Dressings**

- HCPCS Codes A6010, A6011, A6021-A6024
  - Full thickness wound w/light to moderate exudate
  - Wounds that have stalled in healing process
  - Stay in place for up to 7 days

## **Composite Dressing**

### HCPCS Codes A6203 – A6205

- Moderately to highly exudative wounds.
- Provide multiple functions:
  - Physical bacterial barrier
  - Absorptive layer
  - Semi-adherent or nonadherent property
- Up to 3 times/week
  - One wound cover per dressing change

## **Contact Layer**

#### HCPCS Codes A6206 – A6208

- Thin, non-absorptive, porous sheet
- Used to line the entire wound
- Not intended to be changed with each dressing change
- Up to 1 per/week

## Gauze Non-Impregnated

- HCPCS Codes A6216 A6221, A6402 A6404, A6407
  - Up to 3 times/day
    - Without border
  - Up to 1 time/day
    - With border
  - Not usually reasonable and necessary to stack more than 2 in any one area

## **Gauze-Impregnated**

#### HCPCS Codes A6222 – A6224, A6266

- Based underlying material
- Up to once per day

#### HCPCS Codes A6228 – A6230

- Water, bulk saline
- Not reasonable and necessary

#### HCPCS Codes A9270

- Impregnated gauze listed in FDA Orange Book
- Approved drug products with therapeutic evaluations

## Zinc Paste Impregnated Bandage

#### HCPCS Codes A6456

- Covered for venous leg ulcers (surgically created or modified, or debrided)
- 1 time/week
- Billed separate when part of multi-layer system

## **Hydrocolloid Dressing**

- HCPCS Codes A6234 A6241
  - Up to 3 times/week
  - Light to moderate exudate

## **Hydrogel Dressing**

- HCPCS Codes A6231 A6233, A6242 A6248
  - Full thickness wounds with minimal or no exudate
  - Stage III or IV Ulcers
  - No adhesive border
    - Up to once per day
  - Adhesive border
    - Up to 3 times/week
  - A6248 filler
    - Maximum 3 units per/wound, per/30 days

## **Specialty Absorptive Dressing**

#### HCPCS Codes A6251 – A6256

- Unitized multi-layer
  - Semi-adherent or non adherent layer
  - Highly absorptive
- Stage III or IV ulcers
  - Moderate to heavy drainage
- Without adhesive border up to once per day
- With adhesive border up to every other day

## **Transparent Film**

#### HCPCS Codes A6257 – A6259

- Open, partial thickness wounds
  - Minimal exudate or closed wounds
- Up to 3 times/week

### **Wound Pouch**

#### HCPCS Codes A6154

- Waterproof collection device
  - With drainable port
  - Adheres to the skin
- Up to 3 times/week

### **Wound Covers**

- Flat dressing pads
  - · With or without an adhesive border
    - Wound cover with adhesive border
      - » Must be present on all sides
      - » Coding determined by pad size (not including adhesive border)
      - » Additional dressings not needed
      - » Additional tape not required

#### **Wound Fillers**

- Primary dressings placed into open wound to eliminate dead space, absorb exudate, or maintain moist wound surface
- Units of service = 1 gram, 1 fluid ounce, 6-inch length or 1 yard
- Use of more than one type of filler in a single wound is not reasonable and necessary.

Type of Wound Filler	Frequency of Change
Collagen	Can stay in place for up to 7 days
Foam	Up to once per day
Hydrocolloid	Up to three times per week
Hydrogel	Must not exceed amount needed to line surface of wound; max utilization A6248 is 3 units (fluid ounces) per wound in 30 days
Wound filler, Not Otherwise Classified	Up to once per day

#### **Wound Fillers**

#### Forms/Types

- Dry
- Other
- A6261 & A6262
   (NOC): Narrative on claim required

#### **Unique Codes**

- Collagen (A6010, A6011, A6024)
- Alginate/Fiber gelling (A6199)
- Foam (A6215)
- Hydrocolloid (A6240, A6241)
- Hydrogel (A6248)
- Non-impregnated packing strips (A6407)

#### **Included in Other Benefits**

#### Dressings used with:

- Infusion Pumps-included with A4221
- Parenteral Nutrition-included with B4224
- Gastrostomy tubes for Enteral nutrition-included with B4034-B4036
- Tracheostomies-included with A4625 and A4629
- Dialysis Access Catheters-included composite rate/payment cap paid to dialysis provider

Cannot be billed separately when covered under another category

### **Tape**

#### HCPCS A4450, A4452

- Wounds 16 sq. in. or less = up to 2 units per change
- Wounds 16-48 sq. in. = up to 3 units per change
- Wounds 48 sq. in. or more = up to 4 units per change
- Change is determined by frequency of dressing change
- Not required when wound cover has adhesive border

## **Surgical Dressing Materials**

#### **Effective**

- Alginate
- Collagen
- Foam
- Gauze
- Hydrocolloid
- Hydrogel

#### **Not Reasonable & Necessary**

- Silver
- Honey
- Copper
- Charcoal/Carbon Fiber
- lodine (other than iodoform gauze packing)
- Balsam of Peru in Castor oil
- Rolled impregnated gauze (secondary dressing)

## **Multi-Component Dressings**

#### When not classified as composite dressings

- Categorized based on predominant component
- Predominance determined by weight of material
- Single material greater than 50%

#### A4649 Miscellaneous

- If no HCPC for predominant component
- No single material is greater than 50%
- Entered in narrative field on claim

#### Noncovered

- Drainage from a cutaneous fistula
  - Has not been caused/treated by a surgical procedure
- Stage I pressure ulcer
- First degree burn
- Wounds caused by trauma
  - Do not require surgical closure or debridement
  - Bullous Pemphigoid, skin tears, shear, picked or scratched wounds
- Venipuncture or arterial puncture site
  - Other than the site of an indwelling catheter or needle

#### Noncovered

- Small adhesive or first aid type bandages (A6413)
- Silicone gel sheet (A6025)
- Skin sealants or barriers (A6250)
- Wound cleansers/solutions (A6260)
- Gradient compression stockings (A6530, A6533-A6544, A6549)
- Surgical stockings (A4490-A4510)
- Solutions used to moisten gauze (saline)
- Topical antiseptics/antibiotics
- Enzymatic debriding agents
- Gauze/dressings
  - Used to clean/debride but not left on the wound
- Non-elastic binder for an extremity (A4465)

### Incident to Professional Services

- If a treating practitioner applies surgical dressings as part of a professional service billed to Medicare, the surgical dressings are considered incident to the professional services and are **not** separately payable.
- Claims for the professional service, which includes the dressings, must be submitted to the local carrier or intermediary.
- If dressing changes are sent home with the beneficiary, claims for these dressings may be submitted.
  - Use the place of service corresponding to the beneficiary's residence; Place of Service Office (POS=11) must not be used.



## Resources

**CMS** 

**DME MACs** 

**Other Related Contractors** 

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#### **LCD** References

- Local Coverage Determination for Surgical Dressings (L33831)
  - https://www.cms.gov/medicare-coveragedatabase/view/lcd.aspx?LCDId=33831&ContrlD=140
- Related Policy Article for Surgical Dressings (A54563)
  - https://www.cms.gov/medicare-coveragedatabase/view/article.aspx?articleId=54563&ver=38

# Noridian Healthcare Solutions Jurisdiction A Resources

- Website: <a href="https://med.noridianmedicare.com/web/jadme">https://med.noridianmedicare.com/web/jadme</a>
- IVR, Supplier Contact Center, and Telephone Reopenings: 1.866.419.9458
- Noridian Medicare Portal:
   <a href="https://med.noridianmedicare.com/web/jadme/topics/nmp">https://med.noridianmedicare.com/web/jadme/topics/nmp</a>
- LCDs and Policy Articles:
   <a href="https://med.noridianmedicare.com/web/jadme/policies/lcd/active">https://med.noridianmedicare.com/web/jadme/policies/lcd/active</a>



## CGS Administrators, LLC Jurisdiction B Resources

Website: <a href="http://www.cgsmedicare.com/jb">http://www.cgsmedicare.com/jb</a>

• IVR Unit: 1.877.299.7900

myCGS Web Portal: <a href="http://www.cgsmedicare.com/jb/mycgs/index.html">http://www.cgsmedicare.com/jb/mycgs/index.html</a>

Customer Service: 1.866.590.6727

■ **Telephone Re-openings:** 1.844.240.7490

LCDs and Policy Articles:

http://www.cgsmedicare.com/jb/coverage/lcdinfo.html



## CGS Administrators, LLC Jurisdiction C Resources

Website: <a href="http://www.cgsmedicare.com/jc">http://www.cgsmedicare.com/jc</a>

IVR Unit: 1.866.238.9650

myCGS Web Portal: <a href="http://www.cgsmedicare.com/jc/mycgs/index.html">http://www.cgsmedicare.com/jc/mycgs/index.html</a>

Customer Service: 1.866.270.4909

Telephone Re-openings: 1.866.813.7878

LCDs and Policy Articles:

http://www.cgsmedicare.com/jc/coverage/lcdinfo.html



# Noridian Healthcare Solutions Jurisdiction D Resources

- Website: <a href="https://med.noridianmedicare.com/web/jddme/">https://med.noridianmedicare.com/web/jddme/</a>
- IVR, Supplier Contact Center and Telephone Reopenings: 1.877.320.0390
- Noridian Medicare Portal:
   <a href="https://med.noridianmedicare.com/web/jddme/topics/nmp">https://med.noridianmedicare.com/web/jddme/topics/nmp</a>
- LCDs and Policy Articles:
   https://med.noridianmedicare.com/web/jddme/policies/lcd/active



#### **Other Contractor Resources**

- Pricing, Data Analysis and Coding Contractor (PDAC)
  - 1.877.735.1326
  - http://www.dmepdac.com
- National Supplier Clearinghouse
  - 1.866.238.9652
  - http://www.palmettogba.com/nsc
- Common Electronic Data Interchange (CEDI)
  - 1.866.311.9184
  - https://www.ngscedi.com/web/ngscedi/home
  - E-mail: <u>NGS.CEDIHelpdesk@anthem.com</u>

## Questions?

Thank you for attending this A/B and DME MAC collaborative education.

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## Thank you for attending!