

March 15, 2021

Noridian Administrative Services, LLC
P.O. Box 6722
Fargo, ND 58108-6722
Sent via email to: policydraft@noridian.com

Re: Wound Care Local Coverage Determination (LCD): DL38902

To Whom It May Concern:

The Society for Vascular Surgery (SVS) is a professional medical specialty society, composed primarily of vascular surgeons, that seek to advance excellence and innovation in vascular health through education, advocacy, research and public awareness. SVS, on behalf of its 5,900 members, offers the following comments on the Noridian Wound Care draft LCD (DL38902).

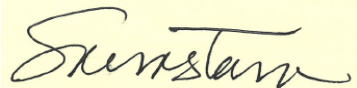
Noridian includes several limitations in the draft LCD on wound care. Limitation #22 includes several points that raise concerns to SVS.

Our first concern is the following sentence “Venous Doppler is of less certain value in the assessment of venous ulcers”. This statement is unfounded and we recommend its deletion.

Our second concern is with the following sentence “It is the expectation of this Contractor that arterial and venous circulation in the extremity be confirmed within two weeks of the initial patient encounter and included in the treatment plan”. SVS supports the prioritization of diagnostic imaging. However including a two-week timeframe in the LCD is not appropriate. SVS recommends replacing “two week timeframe” with “in a timely fashion” in the final LCD. A mandatory two-week requirement has significant potential to exacerbate disparities in healthcare access in underserved populations.

We thank you for your consideration of our comments. If you should have any questions, please don't hesitate to contact us via email at trishacrishock@gmail.com

Sincerely,



Sunita Srivastava, MD
Chair, SVS Coding Coding Committee

cc: Matthew Sideman, MD
Ken Slaw, PhD