



Association for
the Advancement
of Wound Care®



American Physical Therapy Association

Association for the Advancement of Wound Care
January 6, 2020

McLean, VA - In 2019, the [American Physical Therapy Association](#) submitted comments to The Wisconsin Physician Services (WPS) proposal for a Wound Care Local Coverage Determination that said:

1. Debridement for diabetic foot ulcers is not necessary and not covered
2. Debridement for Stage II pressure ulcers is not necessary and not covered
3. Debridement of ANY ulcer not deeper than the layer of skin is not necessary and not covered.

WPS is a Medicare Administrative Contractor that covers: Part A and Part B Medicare benefit administration for Iowa, Kansas, Missouri, and Nebraska, as well as Part A Medicare benefit administration for J5 National providers, both Part A and Part B Medicare benefit for MAC Jurisdiction 8 (J8), and acts as a subcontractor for other CMS contracts.

WPS has [responded to all the comments](#) they received. The new LCD will become effective on February 9, 2020, and [can be found here](#).

Current and proposed LCD is provided below for reference.

<p>Current LCD: When wound care is provided by the Physical Therapist, for both in and outpatient wound care, the medical record is required to have the following documentation: Physician order(s) for physical therapy (PT)/wound care services. Initial evaluation of PT/wound care services. Wound characteristics such as diameter, depth, color, presence of exudates or necrotic. Previous wound care services administered including date and modalities of treatment. Plan of treatment for PT/wound care services. Weekly progress notes to include current wound status, measurements (including size and depth), and the treatment provided. Description of instrument used for selective or sharp debridement (i.e. forceps, scalpel, scissors, tweezers, high-pressure water jet, etc.). Certification/recertification for PT/wound care services. Actual minutes provided to support each timed service/HCPCS provided.</p>	<p>Proposed LCD: When wound care is provided by the Physical Therapist, for both in and outpatient wound care, the medical record is required to have the following documentation: Physician order(s) for therapy /wound care services and signed plan of treatment (also known as a plan of care) detailing treatment modalities for therapy/wound care services must be established before treatment. Initial evaluation of PT/wound care services. Wound characteristics such as diameter, depth, color, presence of exudates or necrotic. Previous wound care services administered including date and modalities of treatment. Weekly progress notes to include current wound status, measurements (including size and depth), and the treatment provided. Description of instrument used for selective or sharp debridement (i.e. forceps, scalpel, scissors, tweezers, high-pressure water jet, etc.). Certification/recertification for PT/wound care services. Actual minutes provided to support each timed service/HCPCS provided.</p>
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Below are changes in the Final LCD:

- When wound care is provided by the Physical Therapist, for both in and outpatient wound care, the medical record is required to have the following documentation:
- Physician order(s) for therapy /wound care services and signed plan of treatment (also known as a plan of care) detailing treatment modalities for therapy/wound care services ***must be established as soon as possible or within 30 days***
- Initial evaluation of therapy/wound care services
- Wound characteristics such as diameter, depth, color, presence of exudates or necrotic
- Previous wound care services administered including date and modalities of treatment
- ***Every 10 days progress notes*** to include current wound status, measurements (including size and depth), and the treatment provided
- Description of instrument used for selective or sharp debridement (i.e. forceps, scalpel, scissors, tweezers, high-pressure water jet, etc.)
- Certification/recertification for therapy/wound care services
- Actual minutes provided to support each timed service/HCPCS provided

For more information, visit the [Center for Medicare & Medicaid Services](#) website. Stay updated on [AAWC's public policy efforts](#) online.