

Centers for Medicare & Medicaid Services
Questions and Answers:
Physicians, Nurses and Allied Health Professionals Open Door
Forum
July 13, 2022

1. Question: On the wound care products on Page 419 of the proposed rule, it says treating these products as Incident 2 supplies would mean that the resource cost for these products would be included in establishing the PERUs associated physician services with which they would be furnished. So that suggests that the skin substitutes would be packaged or the wound care products would be packaged into the physician payment. But then on Page 420 it says we further propose to establish a code for all skin substitutes meeting the criteria for a HCPCS Level 2 code and propose contractor pricing these services effective January 1, 2024. So, that suggests that these codes are going to be contracted priced and not bundled into the physician fee scheduled payment. Can you clarify what CMS's proposal is? Is it to bundle the payment into the physician fee schedule service payment or pay separately for these wound care products as contracted price beginning January 1, 2024?
 - a. Answer: For CY 2023 CMS is proposing contractor pricing the provision of particular wound care management products under the PFS; the MACs set the payment rates in their jurisdictions. In the preamble text of the proposed rule, CMS referenced how incident to supplies are typically incorporated into PFS payment rates, but did not make any proposal other than contractor pricing the provision of specific wound care management products. In order to establish national payment rates for provision of these products, CMS would undertake future notice and rulemaking.
 - i. Question: My second question it has to do with the specimen collection fee. On Page 541 of the proposed rule, CMS says the nominal specimen collection fee for COVID-19 testing for homebound and non-hospital inpatients is \$23.46 cents. And for individuals in a SNF and individuals who samples are collected by a laboratory on behalf of an HHA is \$25.46. I'm not sure what's the difference between a non-hospital inpatient and an individual and a SNF, if you could clarify. A non-hospital inpatient specimen collection is paid at \$23.46 for COVID-19 and then for a SNF it's at \$25.46. And I really never understood this language, but if you could explain what a non-hospital inpatient is if it's not an individual in a SNF.
 1. Answer: Thanks for your question regarding what constitutes a non-hospital inpatient for the purposes of CLFS specimen

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collection and travel allowance. Given that this topic is the subject of current rule-making, we look forward to reading and responding to your formal comments on the different aspects of this proposal. We always appreciate advanced comments in addition to you submitting them formally through the federal register.

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