

October 17, 2023



Thank you for the opportunity to discuss the upcoming Medicare Part B coverage for lymphedema compression supplies.

As stated during our meeting, we were very pleased overall with the proposed rule. It was clear that CMS heard and understood what was being said during the listening sessions with stakeholders, and we are grateful for everyone's efforts to establish a rule that provides comprehensive and equitable coverage. We did feel that there were a few things that needed clarification in the proposed rule, and a couple of unintentional omissions, and those things were noted in our public comments.

The criteria that must be met in order for a patient to qualify for a custom fit compression garment was not included in the proposed rule, and as discussed, it is essential that patients who require these supplies have access to them without undue burdens or delays. Lymphedema is a chronic and potentially progressive disease, so any delay in receiving the treatment supplies needed to maintain that patient's condition will result in a worsening of that patient's condition. Not only is that detrimental to the patient, but often means additional medical costs are incurred.

Additionally, it is imperative that reimbursement rates are fair and reasonable. Different types of compression garments (flat knit versus circular knit, standard fit versus custom fit, etc.) do vary greatly in their costs to manufacture, and that should be reflected in the reimbursement rates. However, we hope that tiered pricing, whereby higher levels of compression receive higher reimbursement rates in otherwise identical compression garments, will not be instituted, as this would burden more severe patients who are least able to afford additional out of pocket costs. Further, current market pricing does not reflect differences in price based solely on the level of compression.

Our all-volunteer patient group was grateful for the opportunity to discuss these concerns as the rule is finalized and we thank you for your work in implementing this new benefit category.

Sincerely,

A handwritten signature in black ink that reads "Heather Ferguson". The signature is written in a cursive, flowing style.

Heather Ferguson
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