

UPDATE: CMS Updates the Home Health Consolidated Billing Supply List

Source: [The Alliance](#), October 7, 2024

The Centers for Medicare & Medicaid Services (CMS) has issued the annual [update](#) to the healthcare common procedure coding system (HCPCS) codes used for home health consolidated billing enforcement.

There are 71 new codes that will take effect January 1, 2025. Most of the new codes are for compression garments and wraps used for patients with a lymphedema diagnosis.

Congress passed the *Lymphedema Treatment Act* in December 2022, establishing Medicare coverage for lymphedema compression garments and wraps under the DMEPOS benefit, effective January 1, 2024. CMS implemented the new benefit through the calendar year (CY) 2024 Home Health Prospective Payment System, Final Rule. In the final rule CMS was silent regarding the intersection of the new lymphedema benefit and the home health consolidated billing requirements. Additionally, CMS did not include the compression garments and wraps in the home health consolidated billing for CY 2024. CMS, only now, seems to have determined that these items are to be classified as Medicare Part B non-routine supplies that are to be included in the home health consolidated billing.

Many of the compression garments and wraps are expensive, costing hundreds of dollars apiece. The Alliance has contacted CMS to inquire why the decision was made to include the compression garments and wraps as part of the home health consolidated billing. Because these items are included with the new and distinct lymphedema benefit under the DMEPOS, we believe there is room to argue that the compression garments and wraps are to be classified as distinct from Medicare Part B non-routine supplies. The Alliance is also working with other stakeholders to encourage CMS to reconsider their decision to add lymphedema compression items as part of home health consolidated billing.

We will keep the Alliance membership updated as we learn more.

UPDATE HERE

The Alliance in coordination with other industry stakeholders contacted CMS to inquire why the decision was made to include the Lymphedema compression

garments and wraps as part of the home health consolidated billing. CMS stated that the inclusion of these items into the home health consolidated billing list, as reported in Transmittal 12794, was done in error.

On September 26, 2024, CMS issued [Transmittal](#) 12851 that rescinds Transmittal 12794 issued August 15, 2024. The revised Transmittal removes all of the Lymphedema items and includes five new Items that will be added to the home health consolidated billing list effective January 1, 2025.