



## Local Coverage Determination (LCD) Process

When WPS began the process of consolidating LCDs, there were 269 Part B LCDs and 127 Part A LCDs in place in Jurisdiction 5 (J5) from all of the outgoing contractors. After all least restrictive LCDs were chosen on several topics, there were still a large number (hundreds) of LCDs left.

The Program Integrity Manual (PIM) describes the guidelines for having an LCD as:

- A validated **widespread problem** which demonstrates a significant risk to the Medicare trust funds (identified or potentially high dollar and/or high volume services)
- A LCD is needed to assure **beneficiary access** to care
- **Frequent denials** are issued (following routine or complex review) or frequent denials are anticipated

CMS outlines the process that allows the MAC contractor to retire an LCD.

Following these guidelines, if we did not think the LCD met a PIM requirement based on our experience, we retired it and sent it to CMS for final approval. CMS approved all of our recommendations to retire LCDs. We ended up with a much more manageable number of J5 LCDs. All retired policies are available on CMS' Website.

As of today, not all of these policies show an end date. We are currently working with CMS to resolve that issue. When any policy is retired, the provider should use the information in the [Internet-Only Manual \(IOM\)](#) located on CMS' Website. The IOM holds all of CMS's guidelines and should always be used in lieu of a policy.

Unlike the normal LCD process that involves Carrier Advisory Committee (CAC) review, no CAC review transpired for final J5 LCDs. Following the transition year that ends in September 2008, we anticipate a return to the normal LCD process, including the LCD reconsideration process. Until that time, the only LCD changes allowed are those to respond to CMS requests for changes, correct typographical errors, and/or add inadvertently omitted CPT, HCPCS and/or ICD-9-CM codes. WPS Medicare must submit these, or any substantive changes to J5 LCDs, to CMS for approval. Upon receipt of CMS approval, the revised LCD is published on the CMS Coverage Database, located on the CMS Website. The policy department welcomes feedback on LCD content now, even if it cannot be addressed immediately, because this will help prioritize items that need more substantive action as we go forward.