

May __, 2013

CMS HCPCS Workgroup
c/o Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop C5-08-27
Baltimore, Maryland 21244

*Re: CMS HCPCS Public Meeting Agenda
May 29, 2013
Agenda Item 27 – Application for new HCPCS code for lactation services*

To whom it may concern:

I am a Certified Lactation Counselor® (CLC) writing to express my concerns regarding the proposed HCPCS code for lactation services. As Certified Lactation Counselor, I have demonstrated competence in the lactation skills, knowledge and attitudes that are essential to helping women in the United States and have agreed to comply with the Academy of Lactation Policy and Practice code of ethics. The Certified Lactation Counselor Training course is recognized by ANCC as a Nursing Skills Competency Program.

I support the concept of creating an HCPCS code for lactation services as an important step in obtaining the well-recognized health benefits associated with higher levels of breastfeeding. However, the proposal before the CMS is fundamentally flawed because it limits reimbursement to an “individualized lactation assessment and intervention visit furnished by an International Board Certified Lactation Consultant”. This limitation would unreasonably restrict the ability of other skilled professionals, many of whom also carry superior credentials to the IBCLC certification, to reimbursement. It would also communicate the misleading impression that only individuals with the IBCLC certification are qualified to provide lactation counseling services.

If CMS is to adopt an HCPCS, I urge CMS to adopt a billing code that includes all qualified professionals, including Certified Lactation Counselors, Advanced Nurse Lactation Consultants, Advanced Lactation Consultants.

Thank you for your consideration of this comment.

Very truly yours,

Via Electronic Mail: HCPCS@cms.hhs.gov