



# BIO-THERAPEUTICS EDUCATION & RESEARCH FOUNDATION

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February 15, 2008

Medicaid HCPCS Coordinator  
Centers for Medicare & Medicaid Services  
Mail Stop S2-01-16  
7500 Security Boulevard  
Baltimore, MD 21244-1850

Dear Medicaid HCPCS Coordinator:

The BTER Foundation wishes to express our support for the request to assign a HCPCS code for maggot therapy.

Our organization represents a rapidly growing population of clinicians using maggot therapy in the U.S. Today there are over 600 medical and surgical doctors prescribing maggot therapy, and thousands of nurses and physical therapists assisting or performing the procedure. This number is growing at a rate of 10% per year. Maggot therapy was performed an estimated 4,000 times last year. Increasingly, maggot therapy is being used in extended care, hospice care, home care, and even by patients themselves and their family.

When we requested a HCPCS code 4 years ago, there was no commercial supplier of medical grade maggots, and the treatment still was not included in many wound care textbooks. At that time, it was felt that there was no national program operating need.

There is now a commercial producer and in increasing national demand for medicinal maggots, in the inpatient, outpatient, and home care/hospice settings. The manufacturer has submitted a request for HCPCS code.

The BTER Foundation would like to express its support for establishing a code for this new biological technology for treating pressure ulcers, diabetic foot ulcers, venous stasis ulcers, non-healing post-surgical wounds, and other common and serious ailments of the elderly.

The cost of this biological wound care product is much less than many current alternatives (especially surgery), but it is still much more than the application procedure alone (CPT) will cover. We believe that it is now appropriate to assign a specific HCPCS code to Medical Maggots, because they meet the criteria for coding and because there is a national need and demand for the product.

Thank you for your consideration. Please feel free to contact us, or use our reference library for more information about maggot therapy, leech therapy, helminotherapy, and other biotherapeutic modalities.

Ronald A. Sherman, MD; on behalf of the BTER Foundation Board of Directors

Disclosure: In 2005, when the University of California ceased providing medicinal maggots for the U.S. market, Dr. Sherman co-founded Monarch Labs in order to continue that service.

**“The BeTER Foundation”**

- supporting patient care, education, and research in biotherapy and symbiotic medicine