

UnitedHealthcare

Attention: Abigail Lisowski

169 Inverness Drive West, Ste 400

Englewood, CO 80112

RE: Formal Objection to Proposed Reimbursement Policy Changes for HCPCS Code S9443

To Whom It May Concern:

This letter serves as a formal objection to the proposed reimbursement policy changes outlined in the “Notice of Material Change to Contract – Preventive Medicine and Screening Reimbursement Policy Changes related to lactation counseling,” dated May 21, 2026.

Specifically, I object to the proposed limitations placed on HCPCS code S9443, including:

The implementation of age restrictions (9 through 64 years), and

The limitation of reimbursement to one session per date of service.

The notice states these changes are intended to align with Centers for Medicare and Medicaid Services (“CMS”) policy. However, this rationale appears inaccurate and unsupported for several reasons:

CMS DOES NOT REIMBURSE HCPCS CODE S9443

HCPCS code S9443 is not a payable Medicare code and has been listed as non-covered by Medicare since January 1, 2007. CMS does not recognize or reimburse S9443 under the Medicare Physician Fee Schedule. Therefore, it is misleading to state that these policy changes are being implemented to align with CMS reimbursement policy when CMS does not reimburse this code at all.

S9443 IS A HCPCS CODE — NOT A CPT CODE

S9443 is a HCPCS Level II code, not a CPT code. The age limitations described in your notice do not originate from the AMA CPT code set or from the HCPCS code descriptor itself. The code does not contain age-based utilization restrictions. Imposing arbitrary age limitations without recognized coding authority support creates unnecessary barriers to medically necessary lactation services.

THE PROPOSED LIMITATIONS ARE CLINICALLY INAPPROPRIATE

Lactation counseling is not appropriately restricted by arbitrary age ranges or limited to a single session per day in all clinical circumstances. Patients may require multiple encounters due to complex feeding issues, maternal complications, infant medical needs, re-lactation, induced lactation, adoptive breastfeeding, or other medically necessary scenarios. Blanket restrictions fail to account for legitimate clinical variation and individualized patient care.

THE POLICY CREATES ADMINISTRATIVE AND CONTRACTUAL CONCERNS

Implementing restrictions that are not supported by CMS reimbursement guidance, Medicare fee schedules, or established HCPCS coding authority creates confusion and may result in improper denials of medically necessary care. The justification provided in the notice does not appear to accurately reflect existing CMS policy regarding S9443.

For these reasons, I respectfully request that UnitedHealthcare reconsider and withdraw the proposed restrictions related to HCPCS code S9443.

Please provide the specific CMS policy citation, Medicare fee schedule reference, or regulatory authority being relied upon to justify these changes, including the source of the stated age restrictions and utilization limitations.

Thank you for your attention to this matter. I request written confirmation that this objection has been received and reviewed.

Sincerely,