

## Attendance Guide For Open Meetings

This attendance guide (the Guide) has been developed to set expectations and facilitate professional conduct during open meetings regarding proposed local coverage determinations (LCD), on the part of both WPS personnel and stakeholders, whether their attendance is in person or by telephone. Stakeholders may include providers, suppliers, beneficiaries, and representatives of the pharmaceutical and medical device industries.

The purpose of the open meeting is to discuss the evidence and rationale for proposed LCDs and provide stakeholders a forum for making comments and asking questions. The aim of WPS is to provide the public equitable opportunities to engage in the LCD process in an open and transparent way. One way we ensure we can meet this aim is by sharing the expectations a participant should have for the open meeting, and by discouraging ex parte communications the day of the meeting. We ask, in the spirit of fairness and transparency, that all participants abide by this Guide. The LCD process offers alternative opportunities for engagement (for example, the informal meeting request) for stakeholders who wish to have a discussion with WPS on a particular topic, including a topic potentially discussed at an open meeting. All communications related to the draft LCDs the day of the open meeting should occur within the bounds of the Meeting Agenda, and in accordance with the open meeting process described by the meeting Chair, including any special considerations shared verbally the day of the meeting.

WPS personnel will be available to discuss matters unrelated to the LCDs. However, these discussions may occur only after the Open Meeting agenda has been completed, in the room established for convening the Open Meeting, and during the time allotted for the Open Meeting that remains on completion of the agenda.

We intend for all stakeholders to engage on an equal level, and as such all stakeholders are requested to comply with this Guide.

### WPS Personnel:

1. Will attend the open meeting, in person when feasible (at least one WPS staff person will attend in person);
2. Will start the meeting on time;
3. Will introduce themselves at the beginning of the meeting; and
4. Will be available to meet with stakeholders during the date and time posted for the open meeting. If all stakeholders have left prior to the posted end time of the open meeting, one WPS personnel will remain available until the posted end time. (If a stakeholder would like to meet with WPS personnel at a different time, he/she may arrange an informal meeting according to the informal meeting procedure outlined on the WPS website.)

## Stakeholders:

1. Attending by phone will call in using the phone number and conference ID published on the open meeting page of the WPS website;
2. The WPS buildings are secure facilities. When meetings are held at a WPS building, those attending in person will need to obtain a visitor ID badge from Security upon arrival at WPS. Also, in-person attendees should expect to be escorted at all times while in WPS facilities, such as to and from the open meeting room, per the WPS Health Solutions Facility Access Security Statement of Procedure. This means that individuals arriving late will need to wait until staff are able to provide escort (this will usually occur at a scheduled break or after public comments). Therefore, early arrival is encouraged in order to fully participate in the meeting.
3. In order to provide equal access, stakeholders should only expect to speak with WPS staff during the designated public comments timeframes. WPS staff will work to provide everyone who requests time, during the public comments, an opportunity to speak. This commitment requires each participant to adhere to their given timeframes and not run over their allotted time, so that they do not place other commenters at a disadvantage. Speakers who run over may be asked to wrap up so that others can have their turn.
4. All participants should silence all electronic devices during the comment period; and
5. Participants will conduct themselves in a professional and civil manner that encourages transparency (e.g., by not initiating ex parte discussions concerning the draft LCDs outside of the meeting). Ex parte discussions disadvantage all meeting participants who may benefit from the equal sharing of information, and also complicate the inclusion of these comments into the deliberations on the policy under discussion. Individuals who seek to initiate discussion outside of the meeting will be reminded of the alternative venues within the LCD process for providing information.

Please be aware that only comments or questions submitted to [policycomments@wpsic.com](mailto:policycomments@wpsic.com) will receive a written response. All responses, either written or oral, are for educational purposes only and do not establish Medicare or WPS policy.

Since the aim of the open meeting is the free and transparent flow of information, WPS must act when activity occurs that runs counter to these aims. When a stakeholder cannot follow the expectations of this guide, WPS will address the situation through the following actions

1. All meeting participants who are not able to meet the expectations in this Guide will be reminded on the first instance of activity that is counter to the effective conduct of the meeting.

2. If the activity persists, steps will be taken to notify the representative body (organization or employer) of the conflict with this Guide and suggest alternative representation or a commitment to corrective action.
3. If after these steps the participant is still unable to abide by this Guide's expectations, the participant will be asked to not attend the meeting in person so as to preserve the effective conduct of the meeting for others in attendance. If an offense is determined by WPS to be egregious enough (e.g., the participant demonstrates abusive or aggressive behavior), earlier steps in the above process may be bypassed.