COALITION OF

Wound Care Manufacturers

September 2, 2014

Marilyn Tavenner
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1612-P
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Comments Submitted Electronically to www.regulations.gov

RE: CMS-1612-P: CY 2015 Physician Fee Schedule

Dear Ms. Tavenner:

On behalf of the Coalition of Wound Care Manufacturers ("Coalition"), I am pleased to submit the following comments in response to the proposed CY 2015 Physician Fee Schedule. The Coalition represents leading manufacturers of wound care products used by Medicare beneficiaries for the treatment of wounds including those products that are subject to the competitive bidding program. We appreciate the opportunity to provide you our comments.

While there are not many provisions within this proposal related to wound care, the Coalition would like to offer our support to CMS in their decision to eliminate two wound care quality measures and specifically, "Use of wound surface culture technique in patients with chronic skin ulcers" and "Use of wet to dry dressings in patients with chronic skin ulcers".

Furthermore, we appreciate the development of the QCDR and support most of the provisions contained in this proposed rule with regards to the QDCR. However, we defer to the comments of the Alliance of Wound Care Stakeholders – a nonprofit multidisciplinary trade association of health care professional organizations – of which we are a non-voting member. We agree with their comments and recommendations with respect to the QCDR and the proposed requirements to obtain 3 outcome measures (which they do not support).

Finally, with respect to the CMS proposal to require manufacturers to report the marketed name of related covered and non-covered drugs, devices, biologicals or medical supplies is an administrative burden for manufacturers. Often clinicians are selected to speak on their experience in a therapeutic area, using multiple wound care products, often in combination in their clinical practice. Not all of the products are from a single manufacturer. During their presentations clinicians reference several wound

5225 Pooks Hill Rd. • Suite 627S
Bethesda, MD 20814
301 530 7846 T • 301 530 7946 F
marcia@nusgartconsulting.com
www.nusgartconsulting.com

care products in the therapeutic area. Therefore the proposed change to require that all products be reported would be an onerous task requiring additional time and resources.

As such, the Coalition requests that CMS maintain the current reporting structure for manufacturers to report the therapeutic area or product category of related drugs, devices, biologicals or medical supplies.

****

On behalf of the Coalition of Wound Care Stakeholders, we appreciate the opportunity to submit these comments. If you have any questions of would like further information, please do not hesitate to contact me.

Sincerely,

Karen Ravitz, JD
Senior Policy Advisor
Coalition of Wound Care Manufacturers
Karen.ravitz@comcast.net
301 807 5296