

Wound Care Manufacturers

December 19, 2019

Seema Verma, Administrator
Centers for Medicare and Medicaid Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Submitted electronically to DMEPOS@cms.hhs.gov

Re: Competitive Bidding Program Survey Comments

Dear Administrator Verma,

On behalf of the Coalition of Wound Care Manufacturers (Coalition), I am pleased to submit comments to the Centers for Medicare and Medicaid Services (CMS) in response to CMS' request for comments on surveys to improve the monitoring, outreach, and enforcement functions of the durable medical equipment, prosthetics, orthotics and supplies (DMEPOS) competitive bidding program (CBP). The Coalition represents leading manufacturers of wound care products used by Medicare beneficiaries for the treatment of chronic non healing wounds including but not limited to negative pressure wound therapy, surgical dressings, and pneumatic compression devices.

The Coalition has the following recommendations:

1. Stakeholders should be surveyed twice a year, to better monitor trends and changes in the competitive bid program.
2. To ensure that the survey is widely distributed, it should be issued through as many channels as possible. The distribution should include emails directly to stakeholders, disseminating to social media and making the surveys available on CMS's website and publications as well as the websites of affected stakeholders.
3. To ensure transparency, the survey results should be publicized and available to the public within a reasonable timeframe which should be determined in advance. The survey results should be published on the CMS website as well.
4. CMS should issue the same surveys in advance of the implementation of the Round 2021 competitive bidding program, to develop a baseline against which CMS can compare survey results from during the competitive bidding program.

Several of our Coalition members are also members of AdvaMed – who also submitted comments. We agree with their recommendations.

The Coalition appreciates the opportunity to provide our feedback on the surveys. If you have any questions or would like further information please contact me at (301) 807-5296

Sincerely,

A handwritten signature in cursive script, appearing to read "Karen Ravitz".

Karen Ravitz
Health Policy Advisor
Coalition of Wound Care Manufacturers