

Wound Care Manufacturers

February 24, 2020

Ms. Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244-1850

RE: IPPS Pressure Injury Quality Measures

Dear Administrator Verma:

On behalf of the Coalition of Wound Care Manufacturers (CWCM), I request that as CMS develops the regulations for the CY 2021 Inpatient Prospective Payment System it considers including the Hospital Harm – Pressure Injury eCQM measures. These measures were included in the proposed CY 2020 rulemaking but were not included in the final Inpatient PPS and as such we request that CMS re-propose these measures for adoption. The Coalition represents leading manufacturers of wound care products used by Medicare beneficiaries for the treatment of wounds. Wound care is a national epidemic masked by comorbidities. Nearly 60 million people in the U.S. are living with diabetes or vascular disease, which are the leading causes of chronic wounds. Over 6.7 million patients suffer from non-healing advanced wounds, leading to unnecessary hospitalization and lower extremity amputations. Patients with chronic wounds have longer lengths of stay, unplanned readmissions, and costs to treat. In fact, a recent study shows that *chronic wounds impact nearly 20% of Medicare beneficiaries (over 11 million) and cause as much as 35 billion dollars in Medicare expenditures (including both fee-for-service and Medicare advantage). A large percentage (36%) of care provided to patients with non-healing wounds is provided in hospital-based outpatient clinics (site of service 19 or 22)* (Nussbaum, Carter, Fife et al. "An Economic Evaluation of the Impact, Cost, and Medicare Policy Implications of Chronic Nonhealing Wounds" *Value in Health* 2017).

The Coalition supports and encourages the continued development of quality measures that assess wound care outcomes, as wound care clinicians should be required to report on measures that relate to the care that they deliver allowing CMS to effectively track and report the quality of that care. As such, we request that CMS include a Hospital Harm - Pressure Injury electronic clinical quality measure (eCQM) in the CY 2021 Inpatient PPS rulemaking. This measure is designed to reduce pressure injury prevalence through rate transparency utilizing complete data extraction of Electronic Health Records (EHR). We believe that pressure injury rate transparency will lead hospitals to identify and implement best practice improvements, which will reduce hospital-acquired pressure injuries. Therefore, we support the broad scope of the measure to include newly developed stage 2, stage 3, stage 4, deep tissue pressure injury, or unstageable pressure injuries that occur during hospitalization.

The Coalition requests that CMS consider placing the Hospital Harm – Pressure Injury eCQM measure into the CY 2021 rule.

Conclusion

On behalf of the Coalition, we appreciate the Agency’s consideration of including the Hospital Harm – Pressure Injury eCQM measures into the CY 2021 rulemaking.

Sincerely,

A handwritten signature in black ink that reads "Marcia Nusgart R.Ph." in a cursive script.

Marcia Nusgart R.Ph.
Executive Director