

Wound Care Manufacturers

June 26, 2020

Ms. Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1735-P
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Submitted electronically to Regulations.gov

RE: RE: FY 2021 IPPS Proposed Rule [CMS-1735-P] - IPPS Pressure Injury Quality Measure

Dear Administrator Verma:

On February 24, 2020 the Coalition of Wound Care Manufacturers (“Coalition”), submitted a request to CMS that as the Agency develops regulations for the Inpatient Prospective Payment System, that the Hospital Harm – Pressure Injury electronic clinical quality measure (eCQM) be included. While this measure was included in the proposed CY 2020 rulemaking, it was not included in the final CY 2020 Inpatient PPS rule nor was it included in the recent CY 2021 proposed rule. We are disappointed that the Agency did not include these measures and hope that the Agency reconsiders placing it into the CY 2021 final rule or at the very least propose its inclusion in the CY 2022 proposed rule. 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 in Medicare expenditures (including both fee-for-service and Medicare Advantage).* (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 the Hospital Harm - Pressure Injury eCQM in the CY 2021 Inpatient PPS final rule, or alternatively, propose this eCQM in next year’s FY 2022 IPPS rule

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 final rule or at the very least propose its inclusion in the CY 2022 proposed rule.

Conclusion

On behalf of the Coalition, we appreciate the Agency’s consideration of implementing the Hospital Harm – Pressure Injury eCQM measure as soon as practicable.

Sincerely,

A handwritten signature in black ink that reads "Marcia Nusgart R.Ph." The signature is written in a cursive, flowing style.

Marcia Nusgart R.Ph.
Executive Director