

May 21, 2014

Ms. Cynthia Hake
CMS HCPCS Workgroup Chair
Centers for Medicare and Medicaid Services C5-08-27
750 Security Boulevard
Baltimore, MD 21244-1850

Re: CMS HCPCS Preliminary Decision #14.010

I am Karen Ravitz and serve as the Senior Policy Advisory for the Coalition of Wound Care Manufacturers. 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 this agenda item.

On behalf of the Coalition – I wanted to thank CMS and the HCPCS workgroup for the preliminary coding decision to maintain individual HCPCS codes for Cellular and/or Tissue Based Products (CTPs) – referred to as skin substitutes in this decision. We strongly agree with the decision not to grant non-specific, HCPCS A codes to CTP products as they do not have the same mechanism of action as wound dressings.

Sincerely,

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