

Wound Care Stakeholders

March 31, 2011

Marilyn Tavenner
Principal Deputy Administrator and Chief Operating Officer
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Dear Principal Deputy Administrator Tavenner,

On behalf of the Alliance of Wound Care Stakeholders (“Alliance”), I wanted to express our endorsement of the need for the Centers for Medicare and Medicaid Services (CMS) to implement negative pressure wound therapy (NPWT) quality standards for those suppliers who may bid for this product category in the event that the Agency includes this product sector in the second round of competitive bidding. The Alliance is 501(c) (6) multidisciplinary trade association comprised of 17 physician, clinical, and patient organizations whose mission is to promote quality care and patient access to wound care products and services.

Due to the recent FDA focus on the use of NPWT in the home care setting, the Alliance wants to ensure that the suppliers who might win the bid to provide these products are knowledgeable and experienced in providing this technology to Medicare beneficiaries. Therefore, we believe that the NPWT supplier quality standards should be incorporated in the external accreditation requirements for all suppliers of NPWT products under Medicare Part B similar to those included in the October 2008 DMEPOS Quality Standards for respiratory, rehabilitation and prosthetics and orthotics products.

In addition, should CMS elect to include NPWT in Round 2 of competitive bidding, we recommend that all bidders of NPWT should be accredited at the time of bid submission in order to ensure that they are prepared to provide all of the support necessary for safe and effective use of these products in the home.

It is our understanding that other associations such as AdvaMed, AAHomecare and NASL have supplied you with their endorsed supplier quality standards. I am attaching a very similar version with some additional clinical language for your consideration.

The clinical organizations who comprise the Alliance are pleased to serve as a resource for you and your staff. Please call me if you have any questions.

Sincerely



Marcia Nusgart R.Ph.
Executive Director

c.c. Jeffrey Kelman, M.D., Jonathan Blum