

2025 Advocacy Accomplishments

Amid significant changes to Medicare payment and coverage plus heightened federal scrutiny of wound care products, the Alliance advanced member priorities to shape policy, protect patient access, support clinical practice, and promote high-quality wound care.



- ✓ **Supported separate payment for CTPs that removes access barriers in HOPDs.** Building on years of advocacy on past payment proposals, the Alliance submitted detailed recommendations that supported and informed CMS' new site-neutral, separate payment structure for CTPs included in both the CY 2026 Physician Fee Schedule and the Hospital Outpatient Prospective Payment System. Changes will reduce fraud/misuse, and decrease Medicare spend on this product category. With the unbundling and separate payment of CTPs driven by Alliance advocacy, hospital outpatient departments win since they will now be able to provide these products to patients with larger wounds.
- ✓ **Supported implementation of clinically flexible, evidence-based CTP LCDs.** Throughout 2025, the Alliance reiterated support of the CTP local coverage determinations finalized in 2024 that our advocacy helped to shape -- policies that after prior release, withdrawal and reissuance now reflect a substantial amount of stakeholder feedback to preserve clinical flexibility, protect evidence-based use of CTPs, and provide a process for evidence submission to expand covered products. The Alliance alerted members to 2025 implementation delays and led programs to educate clinicians about implementation. While the LCDs were ultimately withdrawn in late-December just days prior to their implementation date, the Alliance still believes that LCD implementation is important for appropriate coverage of CTPs that have clinical evidence and to ensure that they are used appropriately.
- ✓ **Sought improved national payment for blood-derived products.** Building on last year's success securing a national payment rate, the Alliance continued urging CMS to more appropriately capture complexity, clinician time and supply costs in upcoming rate updates. The Alliance conducted a clinician survey to quantify actual pre-, intra-, and post-procedure times, establishing realistic clinical work estimates and positioning the Alliance with data to seek updated rates in the CY 2027 rulemaking cycle.
- ✓ **Launched advocacy to establish reimbursement for Point-of-Care Imaging (POCI).** The Alliance created a new POCI workgroup in 2025 in response to member interest in establishing better reimbursement and coverage pathways. We conducted clinician surveys to capture POCI technologies currently being used, codes billed and collected new evidence to challenge a non-coverage decision by Palmetto.
- ✓ **Worked to resolve ongoing surgical dressing claims processing problems.** Alerted DMEMAC medical directors to persistent denials and coding inconsistencies, submitted real-world examples, and recommended solutions.
- ✓ **Stopped flawed non-pressure ulcer cost measure from moving forward.** The Alliance identified methodology flaws in CMS' proposed non-pressure ulcer cost measure and escalated concerns about its inability to fairly assess clinician spend and cost allocation. Due to the combination of the Alliance's feedback and the Alliance clinician workgroup members not supporting the measure the way it was written, CMS' advisory committee did not advance the measure. At this time, the measure is being rewritten with Alliance clinical member input.
- ✓ **Paused FDA's proposed reclassification of antimicrobial dressings.** Escalated concerns to the new FDA and OMB leadership, emphasizing patient access risks. Although scheduled to issue in October 2025, FDA has not issued the final rule — a meaningful regulatory pause that reflects the impact of advocacy.
- ✓ **Responded to new federal priorities on deregulation and tariffs.** Identified numerous opportunities to reduce regulatory burdens in wound care in comments to CMS, HHS and OMB on deregulation. Voiced public health risks associated tariffs on medical equipment and devices.
- ✓ **Submitted 19 comments to regulators and legislators in 2025,** elevating perspectives and recommendations from the wound care community in policy development.