2018 Accomplishments & Activities

- Executive Summary -

With a focus on coding, coverage and payment, the Alliance of Wound Care Stakeholders unites wound care practitioners to educate and advocate patient access to wound care products and services to policy makers/payers. Our 2018 Workplan (Attachment A) and Value Proposition to Members (Attachment B) are included at the end of this document. Several of our key accomplishments in 2018 include:

- Successfully educated 50 Pricing Data and Analysis Contractor (PDAC) staff and all DMEMAC medical directors through a full day educational session at Noridian which focused on diagnosis and treatment of chronic wounds including a hands-on session featuring all types of surgical dressings, disposable and traditional negative pressure wound therapy and CTPs. The session was so successful that the medical directors have requested that we conduct an additional session for the new Palmetto PDAC staff.

- Driving force behind CMS updating its HCPCS coding process including issuing clarifying guidance associated with the application process and advancing a new electronic application process being put into effect in 2019, as well as, increasing transparency in issuing HCPCS codes. CMS released its 2019 HCPCS coding decisions with important, helpful new information such as product name, the preliminary coding decision, final coding decision and rationale – all advocated by the Alliance.

- Requested Noridian in writing to withdraw its CTP policy article restricting coverage questioning its authority to create Medicare coverage restrictions under the guise of an article that is not subject to public notice and comment. This challenge to the A/B MAC illustrates the Alliance’s oversight of the MACs integrating coverage restrictions into policy articles which does not adhere to provisions in 21st Century Cures implementation.

- Identified threats to CTP coverage and payment and mobilized members to address them.

- Advocated for fair, rational and clinically/procedurally-sound coverage and payment policies via submission of comments to relevant CMS prospective payment system policies (hospital inpatient, hospital outpatient), physician fee schedule, A/B MAC local coverage determinations (WPS, Noridian) and commercial medical policies (United Healthcare, AmeriHealth Caritas).

- Identified wound specific implications of draft, final and emerging coverage policies via circulation of summaries, fact sheets and other resources to members.

- Provided Alliance members with access to CMS, DMEMAC and PDAC staff as well as thought leaders and key policy decisionmakers throughout the year with speakers addressing topics such as “Washington Update,” “Payer Perspectives,” and “Legislative Initiatives Impacting Wound Care.”

- Halted the efforts of an ASTM ballot initiative that threatened the status of the CTP standard we were instrumental in putting in place in 2015 to accurately define CTP terminology for payer and coverage purposes.