



Wound Care Advocacy Update

Alliance of Wound Care Stakeholders Calls on CMS to Modify Wound Care Coverage, Payment Policies and Create Waivers in Light of Front-Line Clinical Experience During the COVID-19 Pandemic

July comments to CMS are the latest in a series of Alliance actions to ensure that clinicians can treat patients efficiently and effectively, with appropriate reimbursement

July 20, 2020, Bethesda, MD – The Alliance of Wound Care Stakeholders calls on the Centers for Medicare and Medicaid (CMS) to expand and increase reimbursement for wound-care related telehealth visits; provide flexibility in documentation requirements for continued need and refill of surgical dressings and other supplies; and permit medically necessary procedures to take place on the same date of service so that quality care to be provided to patients while minimizing their risk of COVID-19 exposure.

These and other requests were made in the Alliance’s July [“Comments to CMS Covid-19 Public Health Emergency Second Interim Final Rule.”](#) They are the latest in a series of actions the Alliance and its members have taken to support wound care providers and protect quality wound care. The Alliance is leading the wound care community’s initiatives to ensure that wound care continues to be identified as “essential” and well understood by the CMS leadership and staff developing waivers and other regulatory relief flexibilities during the public health emergency.

“The Alliance and our members, which include more than 20 clinical and physician associations, are asking CMS to ensure that it makes its COVID-related wound care coverage and payment decisions based on the front-line experience of wound care practitioners,” said Marcia Nusgart, executive director of the Alliance of Wound Care Stakeholders. “The coronavirus has drastically changed how and where wound care providers treat their patients. CMS’s temporary rules, waivers and policies must evolve to reflect this new world.”

The Alliance’s July recommendations to CMS include:

- **Temporary relocation site billing:** The Alliance provided specific recommendations regarding the codes which could be utilized by provider-based departments (PBD) when billing for wound care services via telehealth that have been temporarily relocated to a patient’s home. The Alliance recommended that the Agency increase the amount a provider-based department is reimbursed for services provided.
- **Waive standard written order (SWO) provisions in select local coverage determinations (LCD):** The Alliance requested that CMS provide a temporary waiver of the SWO “Practitioner’s Signature Requirement” to enable suppliers to ship select DME supplies to patients more expeditiously.
- **Allow billing for dNPWT telehealth:** The Alliance requested that PBDs and physician offices be allowed to bill for furnishing disposable Negative Pressure Wound Therapy (dNPWT) during the pandemic when providing wound assessment and instruction to patients via telehealth – enabling the therapy to be provided in a way that does not necessitate in-person interaction between the clinician and the patient.
- **Allow total contact casting (TCC) to be provided on the same date of service as other procedure:** The Alliance recommended that CMS waive the provisions that disallow TCC on the same date of service as another procedure to enable quality care to patients while minimizing their risk of exposure.

The Alliance's previous recommendations related to COVID-19 include:

- March 2020 position statement "[Wound Care is an Essential, Not Elective, Service that Prevents Hospital Admissions and ED Visits Among a Fragile Cohort of Patients at High-Risk of Mortality from COVID-19.](#)"
- April 2020 [letter](#) to HHS Secretary Alex Azar and CMS Administrator Seema Verma requesting temporary regulatory waivers related to **site of service, reimbursement, documentation, DME access** and other issues that, with regulatory relief, could remove barriers to treat wound care patients efficiently and effectively during the public health emergency.
- May 2020 [comments and recommendations](#) to CMS COVID-19 Public Health Emergency Interim Final Rule.

To keep the wound care community informed of evolving policies, the Alliance maintains a [COVID-19 Action and Resource Center](#) on its website to serve as "information central" for wound care doctors, clinicians and business entities.

###

For more information, contact
Shelley Ducker
202.255.0561
sduckercommunications@gmail.com