

ACCOMPLISHMENTS

CMS Adopts Negative Pressure Wound Therapy (NPWT) Accreditation Checklist that Alliance Helps Develop after Meeting with Acting Administrator Marilyn Tavenner in January 2012

- The Alliance worked with other organizations to develop this checklist to be used by CMS and accreditation organizations so ensure that only accredited suppliers who were knowledgeable about providing NPWT would win bids. In March 2012, CMS stated that competitive bidding contractors will ONLY be awarded to suppliers who meet the Medicare quality standards and that are accredited specifically for furnishing covered NPWT items and services.

Alliance Convenes Successful Meeting with CMS' Coverage Staff on its paper "Consensus Principles of Wound Care Research"

- CMS staff was complimentary regarding the Alliance and its paper as its authors discussed how the principles compared with CMS' views on coverage with evidence development and suggested that the Alliance could provide the Agency with guidance as it develops policies on these issues.

Alliance Successfully Meets with Key CMS Coding, Coverage and Payment Staff to Educate Them on Cellular and/or Tissue Based Products for Wounds (CTPs) (previously known as skin substitutes)

- Alliance responds to CMS' request to educate the Agency on how and when clinicians use CTPs in their practices, discuss a classification system and circumstances under which they are regulated by the FDA. There was an extremely high level of interest in that 25 senior staff actively participated in the meeting.

Alliance Meets with AHRQ to Educate Agency on Concerns with its Draft CTPs Technology Assessment Resulting in Delay of Release of Final -

- While the Alliance submitted comments to AHRQ on its problematic draft technology assessment on CTPs; it also took proactive steps by meeting with AHRQ staff to provide an understanding of the Alliance's concerns on the methodology issues and scientific and manufacturer perspectives before the final version was released. As of this date, the final has not been released.

Alliance Marshalls Member Involvement to Reverse Issues in Problematic Draft Noridian LCD on CTPs

- Due to the many concerns noted in the Noridian draft LCD on CTPs, the Alliance engaged its membership by participating in the contractor's conference calls/meetings, formed a dedicated workgroup, held multiple conference calls and mobilized members to submit comments leading to Noridian changing its final LCD.

Alliance Convenes Workgroup to Determine Term to Update "Skin Substitutes" since it was Clinically Inaccurate and Impacted both Coding and Coverage Criteria

- Alliance created working group of scientists, clinical organizations, and business entities to develop another term that would be broad and inclusive to include both present and future technology.

Alliance's "Consensus Principles of Wound Care Research" Published in May/June 2012 Peer-Reviewed Publication *Wound Repair and Regeneration*

- The Alliance created a multidisciplinary expert panel in wound care research from its participating organizations to define a set of principles to provide direction to all stakeholders involved in clinical or comparative effectiveness research in wound healing. A modified Delphi approach was used to help reach consensus on the principles. A manuscript was generated that has now been published in the May/June 2012 peer reviewed publication *Wound Repair and Regeneration*.

ACTIVITIES (Comments can be found at: <http://woundcarestakeholders.org/activities-a-accomplishments/official-comments>)

Comments Submitted to Federal Agencies and Their Contractors

- **CMS**
 - **May**- Hospital Inpatient Prospective Payment System re: pressure ulcer classification
 - **Sept**-Physicians Fee Schedule re: quality measures, and DME face-to-face consultation
 - **Dec**- Physicians Fee Schedule final rule re: G codes for NPWT
- **ARHQ**
 - Serves on Technical Expert Panel and submitted two sets of comments on "Prioritization of Future Research Needs for Chronic Venous Ulcers"

Legislative Activity/Letter Submitted to Members of Congress

- Sent letter of support to Members of Congress to support Equity and Access for Podiatric Physicians under Medicaid Act (S1309/HR3364)

National Correct Coding Initiative

- Developed summary brief for SVS and APMA on NCCI edit issues

Negative Pressure Wound Therapy (NPWT) Accreditation Checklist

- Met with CMS Acting Administrator Marilyn Tavenner, Jon Blum and senior staff to discuss the Agency's adoption of the Negative Pressure Wound Therapy (NPWT) supplier accreditation checklist (January 27)
- Met with CMS Director Jon Blum and senior staff along with Alliance of Wound Care Stakeholders to discuss CMS's decision that competitive bidding contracts will ONLY be awarded to suppliers who meet the Medicare quality standards and that are accredited specifically for furnishing covered NPWT items and services. (March 9)
- Noted in Feb 6 Wall Street Journal article "Medicare Auctions are Working Well, Lowering Costs." Sent Letter to Editor to address inaccuracies.

Cellular and/or Tissue Based Products for Wounds

- **Convened workgroup to determine new name to update "skin substitutes"**
 - **Reason to change**- clinically inaccurate term and impacted both coding and coverage criteria
 - **Right time**- AHRQ stated that these products were not "skin substitutes"; CMS abandoned term when the Agency agreed that these products are not skin substitutes and instead issued Q codes for each individual product by its brand name.
 - **Process**- fair and inclusive /a workgroup of scientists, clinical organizations, and business entities
- **ARHQ/CMS**
 - **Jan 2012**-Submitted comments regarding the draft technology assessment on CTPs (skin substitutes)
 - **July**-Met with AHRQ staff in July to address our comments;
 - **Aug**-Met with 3 divisions of CMS on these issues
 - AHRQ still has not released final of technology assessment
- **CMS Contractor Draft LCDs-Noridian on CTPs (skin substitutes)**
 - Noridian has held conference calls/meetings on its Part A and B side in April and May-Dr. David Armstrong spoke on the Part B call; Dr. Barbara Aung spoke on the Part A call (APMA requested her to speak) The Alliance sent a draft of its concerns to both parties for their consideration.
 - The Alliance requested involvement of its members in Noridian jurisdiction related to CAC meetings, state associations and mobilization of members to submit comments. Alliance sent one pager for societies to use with its members; posted call for action on Alliance home page website
 - Formed workgroup; held multiple calls; submitted comments
 - 2013- Noridian adopts most of Alliance's comments
- **ASTM- Standard setting organization**
 - Working with them on nomenclature and guidance document
 - Participated in Nov 2012 meeting/conference call

Alliance Convened Two Meetings with CMS on Aug. 30th

- **Alliance wound care specialists team met with key CMS Divisions (25 senior staff present) to discuss CTPs**
 - Coverage & Analysis Group-coverage
 - Hospital and Ambulatory Policy Group- payment
 - Chronic Care Policy Group- coding

- **Second meeting with CMS Coverage staff**
 - Objective: Position Alliance's "Principles of Wound Care Research" to provide CMS with guidance as the Agency develops policies on these issues;
 - Discussed how the Principles compared with CMS's views on Coverage with Evidence Development

CMS Response: Complimentary, "A Kumbaya Meeting"

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