



August 26, 2016

SUBMITTED ELECTRONICALLY

Mr. Andy Slavitt
Acting Administrator
Centers for Medicare and Medicaid Services
Hubert H. Humphrey Building
200 Independence Ave., SW
Room 445-G
Washington, DC 20201

Re: (CMS-1648-P): Proposed Rule: Medicare and Medicaid Programs; CY 2017 Home Health Prospective Payment System Rate Update; Home Health Value-Based Purchasing Model; and Home Health Quality Reporting Requirements

Dear Acting Administrator Slavitt:

The undersigned members of the Independence through Enhancement of Medicare and Medicaid (“ITEM”) Coalition Steering Committee appreciate the opportunity to comment on the proposed [rule](#) entitled, *Medicare and Medicaid Programs; CY 2017 Home Health Prospective Payment System Rate Update; Home Health Value-Based Purchasing Model; and Home Health Quality Reporting Requirements* (the Proposed Rule). The ITEM Coalition is a national consumer and clinician-led coalition advocating for access to and coverage of assistive devices and technologies for persons with injuries, illnesses, disabilities and chronic conditions of all ages. Our members represent individuals with a wide range of disabling conditions, as well as the providers who serve them, including such conditions as multiple sclerosis, paralysis, hearing and speech impairments, cerebral palsy, visual impairments, spinal cord injuries, brain injury, stroke, spina bifida, myositis, limb loss, Osteogenesis Imperfecta (“OI”), and other life-altering conditions.

Our comments focus on the proposal to implement the newly created statutory benefit to pay home health agencies separately for disposable negative pressure wound therapy. In general, we support the Centers for Medicare and Medicaid Services (CMS) proposal implementing the new statutory benefit, and commend the agency’s efforts to ensure patient access to this important therapy. As a coalition of patient organizations, many of whom represent individuals with mobility impairments that unfortunately lead to serious skin breakdowns and decubitus ulcers, we strongly support the implementation of regulations designed to clarify the new statutory benefit of disposable negative pressure wound therapy. Along with other methods for treating intractable wounds, disposable negative pressure wound therapy will dramatically improve care

for Medicare beneficiaries with injuries, illness, disabilities, and chronic conditions. This therapy is also rendered in a disposable format, which enhances patient compliance and patient ease of use.

It has come to our attention, however, that there is some concern as to the ambiguity of scenarios where disposable negative pressure wound therapy would be appropriate for use in the home health population. We urge CMS to work with beneficiary organizations and the providers who serve them to clarify these issues in order to maximize access to this important therapy.

We believe that clarifying these scenarios in the final rule is critical to ensuring patient access to disposable negative pressure wound therapy in the home. Thank you for your consideration of our comments.

We greatly appreciate your attention to this important issue. Should you have further questions regarding the information contained in our letter, please contact the ITEM Coalition Steering Committee, listed below, or Steve Postal, ITEM Coalition staff, via email at Steve.Postal@ppsv.com or by calling 202-466-6550.

Sincerely,

ITEM Coalition Steering Committee

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