March 25, 2022

The Honorable G.K. Butterfield
U.S. House of Representatives
2080 Rayburn House Office Building
Washington, DC 20515

The Honorable Markwayne Mullin
U.S. House of Representatives
2421 Rayburn House Office Building
Washington, DC 20515

Dear Representatives Butterfield and Mullin:

On behalf of the American Association for Homecare (AAHomecare), I would like to thank you for introducing H.R. 2356, the Better Wound Care at Home Act. We strongly support this legislation, which would resolve administrative burdens that make it difficult for Medicare beneficiaries to get access to disposable negative pressure wound therapy (NPWT) at home.

AAHomecare is the national association representing durable medical equipment, prosthetics, orthotics and supplies (DMEPOS) suppliers, manufacturers, and other stakeholders in the homecare/home medical equipment (HME) community. Our members manufacture, distribute and provide medically necessary DMEPOS items and services to patients in their homes.

As you know, Congress established the home health benefit for disposable NPWT in Medicare in Section 504 of the Consolidated Appropriations Act, 2016 (P.L. 114-113). Since this benefit went into effect in 2017, AAHomecare understands that home health agencies have struggled with the way the Centers for Medicare and Medicaid Services (CMS) has implemented this new benefit. Among these challenges are:

- Requiring that charges for disposable NPWT be submitted to CMS on a billing form that is rarely used by the industry, and for which standard billing software is not adequately designed,
- Reporting requirements that mandate a nurse’s time spent applying disposable NPWT be recorded separately from time caring for a patient’s other conditions, and
- Confusion as to whether home health agencies receive credit for a home health visit when applying disposable NPWT, just as they would when applying the traditional (DMEPOS) alternative.

AAHomecare believes that the Better Wound Care at Home Act will provide technical corrections that will ensure the new benefit is implement by CMS as Congress intended.
Thank you again for introducing H.R. 2356. AAHomecare would like to work with you on the passage of this important legislation

Sincerely,

Tom Ryan
President & CEO
American Association for Homecare