

## Oppose Expansion of Competitive Bidding to Prescribed Ostomy and Urological Supplies

United Ostomy Associations of America, Inc. opposes any Presidential budget proposal or MedPAC recommendations that would expand the Competitive Bidding Program (CBP) to include ostomy and urological medical supplies. The proposal fails to recognize that ostomy and urological prosthetics are not one-size-fits-all products, and are not interchangeable. Not only would any savings be small, they might well be short-term and illusory, and would be made at the expense of service and access for beneficiaries. Both ostomy and urological medical supplies restore the lost functions of waste storage and elimination, and are therefore, defined in the Social Security Act as prosthetics<sup>1</sup>.

### What are Ostomy and Urological Medical Prosthetic Supplies?

Ostomy medical supplies are life-restoring and used by individuals living with colorectal cancer, bladder cancer, Crohn's disease, ulcerative colitis, birth defects, and other intestinal or urinary medical conditions. They are also necessary in cases of severe abdominal or pelvic trauma resulting from accidents or from injuries sustained during military service. People living with an ostomy have undergone surgery to remove their bladder or part of their bowel, which impairs their ability to store and eliminate bodily waste. They have a surgically-created opening (stoma) in their abdomen for the discharge of waste and a 'pouching prosthetic system' is continuously worn over the stoma to replace the lost functions of waste storage and elimination.

A pouching prosthetic system is self-applied, worn every day and removed from and replaced on the skin on a frequent basis. People must use ostomy pouches on a daily basis and often for the rest of their lives. Selection of the appropriate pouching prosthetic is specific to address the needs of patients with individual skin characteristics, to contain different volumes and chemistry of body waste, and to fit the contours and 'tone' of each patient's abdomen. Other factors include the size of the stoma itself, the individual's activity level and lifestyle, and the climate in which they live. Patients cannot interchange prescribed products without medical consequences.

Urological medical supplies, such as catheters, are essential to address urinary incontinence, urinary retention problems from medical conditions, and surgeries that make catheterization a requirement in order to live and function.

### Why Congress Should Oppose Competitive Bidding

Ostomy and urological supplies should continue to be excluded from the competitive bidding program because:

- They are prescribed by medical professionals to address a Medicare beneficiary's tailored medical needs, not a one-size-fits-all, off-the-shelf, or over-the-counter generic product.
- Ostomy products are not easily interchangeable. Because every individual's skin and stomal output are different, it is essential that each person can access the products that are compatible with them. Lack of access to such products is likely to lead to costs that would far outweigh any 'savings'.
- Changes to an individual's prescribed pouching system for non-medical reasons – such as restricted access to products – can lead to medical consequences such as severe skin damage, life-threatening infection and illness which can be difficult to heal, resulting in hospitalization and increased health care costs.
- These products require a health care professional's ongoing services for selection, fitting, training on use, adjustment, and to address health care conditions and clinical complexities that arise. Unlike other medical supplies that are currently in the competitive bidding program, ostomy supplies are not used with other durable medical equipment but rather function on their own, replacing a bodily function.
- A 2004 evaluation and report by the U.S. Department of Health and Human Services<sup>2</sup> concluded that urological supplies were not well-suited for competitive bidding because there was insufficient potential for Medicare savings.

<sup>1</sup>Title XVIII, §1861 (s)(8) of the Social Security Act defines prosthetics as those, which replace all or part of an internal body organ, including colostomy bags and supplies directly related to colostomy care, and replacement of such devices.

<sup>2</sup>Final Report to Congress: Evaluation of Medicare's Competitive Bidding Demonstration for Durable Medical Equipment, Prosthetics, Orthotics and supplies; 2004; Office of the Secretary, Department of Health and Human Services.