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August 25, 2025

Centers for Medicare & Medicaid Services  
U.S. Department of Health & Human Services  
Attention: CMS-1828-P  
P.O. Box 8013  
Baltimore, MD 21244-8013

**Re: CMS Proposed Rule—Inclusion of Ostomy Supplies in the DMEPOS Competitive Bidding Program (CBP)**

Dear Centers for Medicare & Medicaid Services,

On behalf of the Bladder Cancer Advocacy Network (BCAN), I write to express opposition to the proposed inclusion of ostomy supplies within the Medicare DMEPOS Competitive Bidding Program (CBP). While we fully support CMS's goal of cost-efficiency, this expansion undertakes patient-centered risks that cannot be ignored—especially for bladder cancer survivors with ostomies.

Bladder cancer remains a significant public health burden. In 2025 alone, the American Cancer Society estimates 84,870 new cases and 17,420 deaths in the U.S. Currently, over 725,000 individuals are living with bladder cancer. Some of these patients undergo a radical cystectomy (bladder removal) with a urinary diversion, such as a urostomy (ileal conduit), necessitating lifelong use of ostomy supplies. These ostomy supplies are highly individualized, with specific fit, material, and functional needs tailored to each patient. Restrictive competitive bidding threatens:

- Leakage risks, skin breakdown, and infections when unsuitable products are substituted.
- A reduction in patient quality of life—especially for bladder cancer survivors managing stomas or requiring frequent catheterization.

These supplies are life-sustaining, not optional—and must remain accessible through clinical discretion rather than limited supplier availability.

We strongly urge CMS to withdraw ostomy and related urological supplies from the DMEPOS Competitive Bidding Program. Instead, these products should continue to be covered under the prosthetic benefit, accessible through multiple authorized suppliers with physician- or clinician-directed ordering.

We respectfully request that CMS preserve access and clinical flexibility for patients relying on these supplies—particularly bladder cancer survivors and individuals with ostomies.

Thank you for your attention to this critical issue. We stand ready to assist further during this comment period.

Sincerely,

A handwritten signature in black ink, appearing to read 'Meri-Margaret Deodes'. The signature is fluid and cursive, with a prominent initial 'M' and a long horizontal stroke at the end.

Meri-Margaret Deodes  
Chief Executive Officer