

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

GLOBAL WOUND CARE MEDICAL GROUP, a
Professional Corporation,¹

Debtor and Debtor in Possession.

Chapter 11

Case No. 24-34908 (CML)

**RESPONSE OF THE PATIENT CARE OMBUDSMAN TO THE DEBTOR'S
EMERGENCY MOTION TO SCHEDULE STATUS CONFERENCE**

1. I am the Patient Care Ombudsman, appointed by the Office of the United States Trustee in the above referenced case. I have reviewed the *Debtor's Emergency Motion To Schedule Status Conference* [Docket No. 278], and spoken with Counsel for the Debtor about the financial situation facing the Debtor. In discharging my duties as Patient Care Ombudsman I have regularly reviewed the patient care provided by Global Wound Care Medical Group, including through numerous interviews and discussions with the Debtor's clinicians, as well as reviewing medical reports. Because I feel that cessation of patient care would materially and negatively compromise patient care to thousands of patients nationwide, I am filing this additional written report as provided for in section 333(b)(3) of the Bankruptcy Code.

2. The reduction in payments by Medicare will immediately and materially adversely affect the ability to care for wound care patients serviced by Global Wound Care Medical Group. Wound care is essential to our elderly and vulnerable populations and the continued reduction in

¹ The last four digits of the Debtor's tax identification number in the jurisdiction in which it operates is 3572.



payments will inevitably degrade Global Wound Care Medical Group's ability to provide this crucial care.

3. It is essential for the Court to understand that even a mild superficial wound can progress rapidly to a life-threatening condition, potentially leading to severe infections, tissue death, and damage to underlying bones and joints. Wound care is crucial to saving limbs and the lives of our mostly chronically ill, bedbound and elderly population. Without proper wound care, more surgeries with amputations are the next course of treatment.

4. Global Wound Care Medical Group provides an invaluable service. There is a recognized shortage of providers who specialize in wound care. There are many reasons contributing to this shortage, including an aging population, a rise in chronic diseases, many providers aging/retiring, a need for specialization, and geographic maldistribution of trained providers. This shortage results in access to care reductions, worsening patient outcomes, a burden on other healthcare staff, and increasing costs. It is necessary to understand that wound care is labor and supply intensive requiring highly trained individuals. This is considered a 1:1 position, which means, a provider can only work on one patient at a time. The dressings and treatments are complexed and specialized. Most patients with wound care needs usually have multiple wounds simultaneously. Losing one provider or staff member results in delays to crucial patient care which may lead to adverse patient outcomes. The current clients of Global Wound Care Medical Group, which are patients in skilled nursing facilities and home health agencies, will not be able to receive the same level of care promptly. A search to locate providers and train staff to provide basic care for these wounds would take time that these compromised patients may not be able to withstand.

5. This current shortage of providers is one of the reasons I believe led to the success and growth of Global Wound Care Medical Group over just a few years. Their business model

has allowed a more efficient use of a small subset of experts and created a system which allows for better access to highly skilled and competent wound care professionals. I cannot stress enough that high quality wound care prevents or minimizes the pain, infections, sepsis, limb amputations and death in our vulnerable populations.

6. As the Patient Care Ombudsman, I have been impressed with Global Wound Care Medical Group's focus on quality and training. I have observed their onsite skills day training and interviewed multiple high-quality professionals. They have created standardized treatment plans and an evaluation mechanism to ensure their patients are receiving the care required. In my opinion, the continued reduction in Medicare payments will cause the inability to meet the organization's financial obligations to staff and vendors which will lead to a detrimental effect to patient care.

Dated: October 13, 2025

Respectfully submitted,

SUZANNE RICHARDS
PATIENT CARE OMBUDSMAN

/s/ Suzanne Richards

CERTIFICATE OF SERVICE

This is to certify that I have on October 13, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Casey Doherty