

Reps. Langevin, Fitzpatrick, Dingell, and Rose Congressional Sign-on Letter
9/16/2022

The Honorable Chiquita Brooks-LaSure
Administrator
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

Dear Administrator Brooks-LaSure:

We write to follow up on previous communications concerning the Request for Reconsideration of the National Coverage Determination (NCD) for Mobility Assistive Equipment and the currently pending National Coverage Analysis (NCA) for Power Seat Elevation Systems in Complex Rehabilitation Technology (CRT) wheelchairs. We thank you for opening the NCA for power seat elevation systems and look forward to CMS expanding access to these important systems. Power seat elevation systems and power standing systems used in these wheelchairs provide significant medical and functional benefits to many individuals with severe mobility impairments. Advancing Medicare coverage for these systems will help ensure that Medicare beneficiaries with disabilities like paralysis, muscular dystrophy, ALS, spina bifida, and other mobility disabilities can equitably access these benefits.

As you know, a group of patients, providers, researchers, and other subject matter experts submitted the aforementioned Request for Reconsideration in September 2020, seeking Medicare coverage of both power seat elevation and power standing systems. In August 2022, nearly two years after the initial request was submitted, CMS opened an NCA for power seat elevation systems. We greatly appreciate that CMS has taken this step, as it is an important opportunity for the agency to gather additional information that will inform its eventual coverage decision. However, we are concerned that CMS unexpectedly and without explanation bifurcated the initial request and did not open the related review of power standing systems or provide a timeline for doing so. Therefore, we request that:

1. CMS move expeditiously to advance Medicare coverage for power seat elevation systems, consistent with the existing body of clinical evidence and within all applicable rules and regulations; and
2. CMS promptly move forward with opening an NCA for power standing systems.

Power seat elevation and power standing systems improve the health and independent function of mobility-impaired individuals and allow them to perform or increase their participation in mobility-related activities of daily living (MRADLs) in the home. Seat elevation systems allow users to raise and lower themselves in the seated position through an electromechanical lift system embedded into their CRT wheelchairs. These systems assist with safer transfers from wheelchairs to other surfaces such as beds, chairs, and toilets; reduce upper extremity injury due to prolonged wheelchair use; and reduce neck pain by providing a more level line-of-sight with other individuals. Standing systems allow users to transition from seated to standing positions

without the need to leave their wheelchairs, allowing independent performance of MRADLs and a host of medical benefits derived from bearing weight on an individual's body frame. These medical benefits include improved joint mobility and muscle tone; increased strength and bone density; enhanced cardiovascular and respiratory functions; and reductions in falls, neck and spine injuries, skin breakdowns, spasticity, and muscle contractures.

Coverage of these technologies will bring significant benefits to Medicare beneficiaries with mobility impairments, making a timely review and decision process that much more important. Therefore, we respectfully urge you to move forward expeditiously with your review of public comments and the full body of clinical evidence regarding coverage of power seat elevation systems, and to promptly open the NCA and public comment period regarding coverage of power standing systems.

Thank you for your ongoing work on behalf of Medicare beneficiaries and all individuals with disabilities.

Sincerely,

CC:

Meena Seshamani, M.D., Ph.D.
Deputy Administrator and Director, Center for Medicare