



**OHIO ASSOCIATION OF
MEDICAL EQUIPMENT SERVICES**

March 17, 2023

Via Electronic Submission to Medicare Coverage Database

Re: Administrative File: CAG-00461N; Comments on CMS Proposed Decision Memo: Seat Elevation Systems as an Accessory to Power Wheelchairs (Group 3)

The Ohio Association of Medical Equipment Services (OAMES) is pleased to offer comments on CMS' proposal to include power seat elevation equipment on Group 3 power wheelchairs within the durable medical equipment (DME) benefit. OAMES is a non-profit state trade association that advocates access to quality DME services. The association's membership includes a broad cross-section of the homecare community with local, regional and national HME providers as well as hospital-based organizations, pharmacies, manufacturers, distributors and various service vendor partners serving the DME and homecare sector.

OAMES is an active member of the American Association for Homecare (AAHomecare), the national voice of the DME provider community, and we work in close collaboration to advance state and federal policies for DME providers and consumers. As such, we fully support [AAHomecare's full comments outlined here](#) which are summarized below:

1. Finalize the proposed Benefit Category Determination holding that power seat elevation systems are primarily medical in nature and are considered DME under the Medicare benefit; and finalize the proposed coverage determination holding that these systems are reasonable and necessary for Medicare beneficiaries who use Group 3 and above CRT power wheelchairs in order to perform transfers for the purpose of performing or participating in mobility related activities of daily living (MRADLs);
2. Include coverage for Medicare beneficiaries who need seat elevation to improve their reach and line of sight to support shoulder, upper spine, and neck integrity while performing or participating in MRADLs;
3. Include coverage of seat elevation for Medicare beneficiaries who use Group 2 CRT power wheelchairs in the final NCD; and
4. Provide important clarifications to the proposed NCD, including further detail regarding "weightbearing transfers," beneficiaries using patient transfer devices, and the specific criteria for specialty evaluations.

Thank you for the opportunity to provide comments. Our members are proud to be part of the continuum of care that assures Medicare beneficiaries receive cost-effective, safe and reliable home care products and services. Your consideration is greatly appreciated. Please contact me at kam@oames.org if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Kamela Yuricich".

Ms. Kamela (Kam) Yuricich
Executive Director

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