



DRAFT Comment Letter for Seat Elevation/Standing Systems – Organization

(Please use this as an example – do not copy and paste!)

As an organization who represents wheelchair users, we hear from thousands of community members who are in endless battles with payors fighting for medically necessary equipment, which are currently considered “accessories.” Many invest hundreds of hours navigating the complicated appeals process and often give up and go without this life-altering equipment.

We are thrilled you are considering coverage of two critically important systems for power wheelchair users, seat elevation and standing feature. We think this is long overdue. These systems are critical for daily safety when a person with quadriplegia is left alone at home for hours, without a caregiver, because insurance will often not cover enough home health care hours and services. Expanding access to these systems will allow users to accomplish safe transfers from a wheelchair to a toilet, bed, or other surface and allow individuals to live more independently and perform mobility-related activities of daily living (MRADLs). Individuals can work, cook, dress, and perform daily hygiene tasks often without any other assistance, if they are able to use seat elevation and standing systems.

While we collect anecdotal evidence, we understand you have received numerous peer-reviewed studies proving that these systems can improve circulation, mobility, gastrointestinal health, range of motion, promotion of vital organ capacity, improved bone density, and reduced occurrence of skin ulcers and skeletal deterioration. I don’t think we can underscore enough the devastating, life-threatening, and expensive toll a skin ulcer can have on an individual. Wheelchair users can spend years on bedrest in hopes it heals and often requires several surgeries. It seems to us that this would be a built-in savings for CMS, since if one survives a wound, insurance often must cover services and surgeries well over \$100k.

Thank you for this opportunity to submit these brief comments. Coverage of this systems will allow power wheelchair users the ability to live independent and healthier lives.

EXAMPLE

Visit www.rise4access.org for more information on how you can help advance coverage for seat elevation and standing systems.