



DRAFT Comment Letter for Seat Elevation/Standing Systems – Clinician

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

Thank you for considering these comments on opening the national coverage determination (NCD) for Mobility Assistive Equipment (MAE) to consider power seat elevation and power standing systems for coverage under Medicare. Power seat elevation systems and power standing systems are integral to enabling independence within the home environment and mitigating medical comorbidities that often occur with chronic healthcare conditions that impair mobility.

Group 3 power wheelchairs are currently covered under Medicare for people who meet the established coverage criteria, including those with neurological conditions, myopathies, and congenital skeletal deformities. While other power options are covered, such as tilt and recline, power seat elevation systems and power standing systems are currently not covered.

However, the power seat elevation and power standing systems on power wheelchairs are integral for people with chronic mobility limitations. Power seat elevation systems reduce risk of repetitive strain injuries and pain in a power wheelchair users' shoulders and neck by raising them up to the level of the object for which they are reaching. Additionally, they aid transfers by enabling the power wheelchair user to change their seat to be equal height with what they are transferring to. Power standing systems address many medical concerns of people with prolonged immobility, such as musculoskeletal concerns such as range of motion limitations and spasticity, digestive circulation and urinary health, cardiovascular health, and skin integrity and preventing pressure injuries.

The language change for the national coverage determination acknowledges the reality that power wheelchair users need to access the vertical environment to do their mobility related activities of daily living. Thank you for considering this request.

EXAMPLE

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