

March 17, 2023

SUBMITTED ELECTRONICALLY VIA Medicare Coverage Database Portal

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

RE: Proposed National Coverage Determination for Power Seat Elevation Equipment on Power Wheelchairs [CAG-00461N]

Dear Administrator Brooks-LaSure:

The ALS Association is pleased to support the Centers for Medicare and Medicaid Services (CMS) proposed decision memorandum to include power seat elevation equipment in the benefit category for durable medical equipment per Section 1861(n) of the Social Security Act. As previously stated in our September 2022 comments, we consider seat elevation systems reasonable and necessary equipment in power wheelchairs.

The ALS Association is the only national nonprofit organization fighting ALS on every front. By leading the way in global research, coordinating multidisciplinary care through certified clinical care centers, and fostering government partnerships, we build hope and enhance quality of life while aggressively searching for new treatments. Our commitment is that every person living with ALS, regardless of where they live, should be able to access high-quality care and equipment and effective treatments. Our goal is to make ALS livable for everyone, everywhere, until we can cure it.

We are committed to ensuring that all people with ALS have access to medical equipment that enhances their health and wellbeing and improves their quality of life. On behalf of the ALS patients and families we serve, we appreciate the opportunity to express our full support for Medicare coverage of power seat elevation systems for use by disabled individuals, including people living with ALS.

The ALS community values Medicare coverage of durable medical equipment and especially access to medically necessary technologies for people living with ALS. In accordance with the purposes expressed in the findings of the National Coverage Analysis (NCA), we agree with the consensus that power seat elevation systems integrated in power wheelchair systems are a medically necessary safety feature. These systems are especially necessary in the performance of non-level transfers and are useful in performing other medically necessary purposes such as assisting with activities of daily living (ADLs).

We applaud the decision and strongly encourage CMS to finalize its National Coverage Determination (NCD) for seat elevation systems integrated in power wheelchair systems.



OUR VISION: Create a world without ALS.

OUR MISSION: To discover treatments and a cure for ALS, and to serve, advocate for, and empower people affected by ALS to live their lives to the fullest.

NATIONAL OFFICE • 1300 Wilson Boulevard, Suite 600, Arlington, VA 22209 • PHONE 202.407.8580 FAX 202.464.8869 • als.org

Please contact Rich Brennan, Vice President, Federal Affairs, rich.brennan@als.org with any questions.

Sincerely,

A handwritten signature in black ink that reads "Melanie Lendnal". The signature is written in a cursive, flowing style.

Melanie Lendnal, Esq.

Senior Vice President, Policy and Advocacy