



## **Exempt Seating Cushions from Competitive Bidding**

The Independence Through Enhancement of Medicare and Medicaid (“ITEM”) Coalition supports an exemption for specialty wheelchair adjustable seating cushions from the DMEPOS Competitive Acquisition program, commonly known as “DME competitive bidding.” We are very concerned that competitive bidding of specialized wheelchair seating cushions for those who spend long periods of time in mobility devices will lead to reductions in the range of seating options offered by winning suppliers under the competitive bidding program. This, in turn, will severely restrict access to high quality products and will very likely result in very costly decubitus ulcers and other medical complications associated with long term wheelchair use. We understand that exemption in round one is unlikely, but we urge you to exempt adjustable seating cushions in round two. We have not take the position of advocating for a complete repeal of the competitive bidding program, but in instances of adjustable, specialized, non-homogeneous products where high-quality is of the utmost importance, we believe that competitive bidding fails the consumer.

The ITEM Coalition is a consumer-led coalition of disability-related organizations with the goal of improving access to assistive devices, technologies, and related services for individuals with disabilities and chronic conditions of all ages. We believe that specialized assistive devices need to be tailored to individuals with disabilities to ensure quality care and the greatest function and independence possible for the individual.

Permanent wheelchair users spend many hours, day after day, in a seated position applying a large percentage of their body weight to one location on the body. Due to an individual’s disabling condition, this area of the body is often insensate, which puts a premium on well-fit, specialized seating cushions and other supports to evenly distribute weight and improve posture while in a seated position. Proper seating supports help facilitate weight transfers and other techniques to keep blood flowing and skin breakdowns to a minimum.

The importance of managing pressure sores and skin breakdowns in this population cannot be overstated. An NIH report in the 1990s estimated the national costs of treating decubitus ulcers and related skin breakdowns at \$8 billion annually. In a sense, a specialized seating system for a permanent wheelchair user is just as important as a well-designed and fit socket of an artificial limb for a limb amputee.

Specialized wheelchair seating cushions for long-term wheelchair users are fitted to each patient and require an evaluation involving physical and occupational therapists, mobility device engineers, and wheelchair suppliers. Access to such specialized seating cushions, if subjected to

competitive bidding, will invariably suffer as winning bidders offer seating cushions that have the lowest cost and, therefore, yield the largest profit for suppliers in order to make ends meet. As winning suppliers are incentivized to switch to less costly products through competitive bidding, beneficiaries will lose access to specialized seating cushions through Medicare and may be forced to purchase products completely out-of-pocket, if at all.

Please ensure beneficiary access to specialty wheelchair seating cushions by excluding these devices from round two DME competitive bidding. Thank you and we look forward to working with you on this important matter. If you have any questions, please contact Peter Thomas, Counsel for the ITEM Coalition, at 202.466.6550, or any of the Steering Committee members below.