



## **Federal Policy Priorities – 2022**

- 1. Medicare Coverage of Seat Elevation and Standing Systems in Power Wheelchairs**
  - a. Continue Supporting National Coverage Determination Request for Reconsideration through CMS Review Process
  - b. Engage with Congress to Support Coverage of These Systems
  
- 2. Medicare Coverage of Vision Benefits**
  - a. Continue with Initiative to Improve Vision Care in Medicare through Coverage of Low Vision Aids as DME
  
- 3. Complex Rehabilitation Technology (CRT)**
  - a. Advocate for Legislation to Create a Separate CRT Benefit Category.
  - b. Develop Advocacy and Communications Strategy on Revision of “In the Home” Requirements
  - c. Addressing Coding Problems and Seek to Preserve Access to Titanium, Bariatric, and Positional Tilt Wheelchairs
  
- 4. Accessible Medical Equipment**
  - a. Expand Adoption of Enforceable Standards for Accessible Medical Equipment, Especially Diagnostic Equipment
  - b. Engage with Departments of Justice, Health and Human Services, and Others as Necessary to Secure Rulemaking
  - c. Expand Availability and Adoption of Accessible Medical Information and Communication Technology in All Health Care Settings for Individuals with Disabilities
  
- 5. Medicare Coverage of Innovative Technology**
  - a. Monitor and Comment on Regulations Defining Transitional Coverage for Emerging Technologies
  - b. Support Legislative Efforts to Codify Transitional Coverage for Emerging Technologies/Medicare Coverage of Innovative Technologies Pathways
  - c. Monitor and Comment on Regulations Implementing Definition of “Reasonable and Necessary” for Purposes of Medicare Coverage, Especially Consideration of Private Insurance Policies
  
- 6. DMEPOS Issues**
  - a. Monitor Patient Access to Oxygen Equipment
  - b. Advocate for Patient Access to Disposable Negative Pressure Wound Therapy through Legislative and Regulatory Action
  - c. Protect Against Coverage Restrictions for Intermittent Catheters
  - d. Improve Access to Timely Repairs of DMEPOS

- e. Advocate to Prevent Further Expansion of Competitive Bidding to Ventilators and Orthoses other than Truly Off-the-Shelf (OTS) Orthoses
- f. Monitor Implementation of Blended Payment Rates to Protect Patient Access to DMEPOS in Rural and Non-Competitive Bidding Areas

**7. Orthotics & Prosthetics (O&P) Issues**

- a. Urge CMS to Re-Examine and Implement BIPA Section 427, including Exemptions for Certain Professionals Providing Custom O&P Care
- b. Support OTS Orthotics Legislation to Preserve Access to Clinical Orthotic Services (Medicare O&P Patient-Centered Care Act)

**8. Reform HCPCS Coding System**

- a. Continue Working to Improve the Coding, Coverage, and Payment Process for DMEPOS
- b. Work to Ensure Benefit Category and Payment Determination Processes are Fair, Transparent, and Accountable

**9. Affordable Care Act**

- a. Defend Essential Health Benefits, Particularly Rehabilitation and Habilitation Devices Benefit Category, as well as Insurance Provisions

**10. Medicaid Coverage of Cochlear Implants (CI)**

- a. Advance Medicaid Coverage of Processors for Cochlear Implants as well as Coverage Policies that Advance Access to CI and Accessories/Supplies

**11. Promote Consideration of Patient Experience and Functional Outcomes in CMS Coverage and Payment Determinations**

**Monitor & Support**

**1. “Triple A” Study Act**

- a. Monitor Reintroduction of Access to Assistive Devices and Technology for Americans Study Act and Support Passage in 117<sup>th</sup> Congress

**2. Over-the-Counter Hearing Devices**

- a. Monitor Development of FDA Regulations Governing Over-the-Counter (OTC) Hearing Aids

**3. Telehealth Expansion**

- a. Monitor Expansion of Telehealth by Federal Payers for Potential Patient Access Concerns