



## Federal Policy Priorities – 2025

### 1. Medicare Coverage of Seat Elevation and Standing Systems in Power Wheelchairs

- a. Seek immediate opening of National Coverage Analysis (“NCA”) for standing systems in power CRT wheelchairs.
- b. Continue supporting National Coverage Determination (“NCD”) for seat elevation coverage through coding and payment consideration.
- c. Engage with Congress and new Administration to press for advancement.
- d. Engage with Congress and the new Administration to promote greater transparency and speed of the NCD process generally.
- e. Support high-quality candidates with experience in the field to be nominated to the Medicare Evidence Development & Coverage Advisory Commission (“MEDCAC”)

### 2. Complex Rehabilitation Technology (CRT) and Wheeled Mobility

- a. Improve access to timely service and repairs of wheelchairs.
  - i. Engage with Congress to introduce and help pass federal wheelchair repair and maintenance legislation.
- b. Improve access to titanium and carbon fiber wheelchairs through coding reforms.
  - i. Engage with Congress to help support and pass S. 247, the *Choices for Increased Mobility Act of 2025*, which would improve access to these wheelchairs.
- c. Develop Congressional advocacy and communications strategy on revision of “In the Home” requirements under the DME Medicare benefit.
- d. Revisit merits of creating a separate statutory Medicare benefit category for CRT.
- e. Monitor and advocate as appropriate to improve access to power-assist manual wheelchairs.

### 3. Medicare Coverage of Low Vision Benefits

- a. Continue with initiative to improve vision care in Medicare through coverage of low vision aids as DME and coverage of related services.
- b. Seek regulatory review of 2008 DME rule barring coverage of all low vision aides.

### 4. DMEPOS Coverage and Access Issues

- a. Support implementation of new code set for intermittent catheters (Effective 1/1/26)
- b. Remove inappropriate spinal cord injury coverage restrictions for intermittent catheters.
- c. Improve Medicare coverage for devices for Transanal Irrigation (“TAI”) for Medicare beneficiaries with Neurogenic Bowel Syndrome.

- d. Advocate to prevent further expansion of competitive bidding to ventilators and orthoses other than truly Off-the-Shelf (“OTS”) orthoses.
- e. Monitor and advocate as appropriate for increased transparency and oversight in Medicare Advantage plan’s coverage restrictions for DMEPOS.
- f. Support legislative and regulatory efforts on blended payment rates to protect patient access to DMEPOS in rural and non-competitive bidding areas.
- g. Monitor patient access to oxygen equipment.
- h. Support implementation of legislation expanding patient access to Disposable Negative Pressure Wound Therapy (“DNPWT”).
- i. Monitor and respond as appropriate to issues around state Medicaid coverage of seizure detection devices.

## **5. Orthotics & Prosthetics (O&P) Issues**

- a. Engage with Congress to reintroduce and support the *Medicare O&P Patient-Centered Care Act*
- b. Support implementation of Medicare coverage for exoskeleton technology.
- c. Engage with Congress to reintroduce and help pass the *Veterans STAND Act*.
- d. Support and promote new Medicare coverage for micro-processor knees (“MPKs”) for K2 Amputees.
- e. Urge CMS to re-examine and implement BIPA Section 427, including exemptions for certain professionals providing custom O&P care.
- f. Engage with Congress to reintroduce and help pass the *Veterans SPORT Act*.
- g. Monitor and support efforts to increase access to osseointegration technology.
- h. Support reform of the coding system for upper limb prosthetics.
- i. Promote and build support for expanded coverage of anti-obesity medications (“AOMs”) under the Medicare and Medicaid programs (which have been shown to reduce the incidence of limb loss).

## **6. Improving Coverage of Cochlear Implants (CI) for People with Hearing Loss**

- a. Support NCD request for coverage of cochlear implants (“CI”) for single-sided deafness (“SSD”).
- b. Advance Medicaid coverage of processors for cochlear implants as well as coverage policies that advance access to CI and accessories/supplies.

## **7. Accessible Medical Diagnostic Equipment**

- a. Continue support for enforceable standards for accessible medical equipment, especially diagnostic equipment.
- b. Oppose Administrative efforts to revisit these final regulations.
  - i. Engage with Departments of Justice, Health and Human Services, and others as necessary to ensure enforcement of recently finalized rules.
- c. Monitor availability and adoption of accessible medical information and communication technology in all health care settings for individuals with disabilities.

**8. Medicare Coverage for New and Emerging Technologies**

- a. Monitor Trump Administration’s action on Transitional Coverage for Emerging Technologies (“TCET”) and potential repeal and replacement.
- b. Engage with Congress to reintroduce and pass the *Ensuring Patient Access to Critical Breakthrough Products Act*
- c. Draft future-focused statement on the importance of covering new medical technologies and the need for Congress to address this pressing concern.
- d. Support tax incentives to assist individuals in defraying the cost of DMEPOS.
- e. Explore other tax incentives to enable information technology to be more accessible for people with disabilities.

**9. Affordable Care Act and Non-discrimination Issues**

- a. Defend Essential Health Benefits (“EHBs”), particularly the rehabilitation and habilitation devices benefit category, as well as insurance provisions.
- b. Monitor implementation and enforcement of new Section 504 of the Rehabilitation Act of 1973 and the ACA’s Section 1557 Final Rule
- c. Support full enforcement of these new regulations.