



Medicare Coverage for Seat Elevation and Standing Systems in Power Wheelchairs

Seat Elevation Systems: In a landmark decision, in May 2023, CMS announced Medicare coverage for power seat elevation systems as an accessory to power wheelchairs (PWCs) through a National Coverage Analysis (NCA) with a final [National Coverage Determination](#) (NCD). The coverage decision represents one of the biggest wins for the disability community in the last decade and follows years of advocacy by the ITEM Coalition, as well as key national paralysis, disability, and aging organizations.

Power seat elevation systems allow wheelchair users greater ability to engage in many activities of daily living such as transferring in and out of a wheelchair, preparing meals, and reaching items placed at variable heights. This final NCD means that, subject to an evaluation for coverage, power seat elevation equipment is considered reasonable and necessary for individuals using both complex rehabilitative technology (CRT) and standard power-driven wheelchairs who meet criteria defined in the NCD.

Standing Systems for Power Wheelchairs

In addition to the NCD request for powered seat elevation systems, the ITEM Coalition also requested CMS to reconsider coverage for standing equipment associated with Group 3 power wheelchairs. That request is still pending at CMS and an NCA is expected to be formally “opened” for public comment soon.

In July 2023, the ITEM Coalition supported a [Dear Colleague Letter](#) organized by the United Spinal Association and led by Representatives Brian Fitzpatrick (R-PA) and Debbie Dingell (D-MI). This letter was supported by 12 Members of Congress, requesting that CMS open the NCA on standing systems in power wheelchairs. For individuals who spend large parts of their day in a seated position, the value of being able to stand, bear weight on the lower limbs, and allow gravity to aid in metabolic functions is well established in the clinical literature. The letter also urged CMS to conduct a full review of its current mobility device coverage coding and payment policies, including the “in the home” restriction, to determine whether they are in need of reform to better meet the mobility needs of beneficiaries both within their homes and in their communities.

In September of 2023, CMS [responded](#) to both issues raised in the Congressional Dear Colleague letter. Regarding the standing systems NCD, CMS reiterated that because the evidence base for power seat elevation wheelchair systems is distinct from that of power wheelchair standing systems, CMS is considering these systems separately. Again, no specific timeline was provided regarding the opening of the standing features NCA. Regarding the “in the home requirement,” CMS stated that section 1861(n) of the Social Security Act limits the Medicare Part B benefit for DME to equipment used in the patient’s home. Accordingly, CMS stated that changes by Congress to the statute are needed to modify the “in the home” requirement in the definition of DME at section 1861(n) of the Act.

While we applaud CMS’s decision in 2023 to cover power seat elevation, we have waited nearly four years for CMS to open the NCA for standing systems coverage. Once CMS does so, there is a 10-month process that must be undertaken for comment development and submission, an initial determination from CMS, followed by another 30-day comment period, before a final coverage decision is made. Timely action on standing systems remains the ITEM Coalition’s top priority in 2024.