



**CONSORTIUM FOR CITIZENS  
WITH DISABILITIES**

September 2, 2014

The Honorable Charles Schumer  
U.S. Senate  
322 Hart Senate Office Building  
Washington, D.C. 20510

The Honorable Thad Cochran  
U.S. Senate  
113 Dirksen Senate Office Building  
Washington, D.C. 20510

The Honorable Joseph Crowley  
U.S. House of Representatives  
1436 Longworth House Office Building  
Washington, D.C. 20515

The Honorable Jim Sensenbrenner  
U.S. House of Representatives  
2449 Rayburn House Office Building  
Washington, D.C. 20515

**Re: Ensuring Access to Quality Complex Rehabilitation Technology Act (S. 948/H.R. 942)**

Dear Senators Schumer and Cochran and Representatives Crowley and Sensenbrenner:

The undersigned member organizations of the Consortium for Citizens with Disabilities write in strong support of the Ensuring Access to Quality Complex Rehabilitation Technology Act (S. 948/H.R. 942).

The Consortium for Citizens with Disabilities (CCD) is a coalition of more than 100 national disability organizations working together to advocate for national public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society.

By creating a separate benefit category under Medicare for complex rehabilitation technology (CRT), this bill would protect access to medically necessary customized products. These products include individually configured manual and power wheelchairs, adaptive seating systems and alternative positioning systems, and other specialized equipment that requires evaluation, fitting, design, adjustment and programming for individuals living with significant disabilities and chronic conditions. In addition to meeting individuals' medical needs and with potential savings for future healthcare costs, CRT products and services are vital to helping such individuals remain independent.

This legislation contains key provisions that enable individuals with significant disabilities and chronic conditions to be active members of their communities. First, it exempts CRT products from Medicare's "in-the-home" restriction. The "in-the-home" policy restricts coverage of mobility devices to those which are only used inside a person's home and the

CRT exemption from this policy allows people to use their mobility devices when conducting important, community activities like going to the doctor's office or to the grocery store. Second, the bill allows beneficiaries in skilled nursing facilities to obtain access to CRT products when transitioning to the home and community (if they are included in the care plan).

CRT is currently available under Medicare's durable medical equipment benefit, but a separate category is warranted for CRT because CRT is fundamentally different from standard DME products. Because of their individualized nature, CRT products require an interdisciplinary team to ensure proper evaluation, configuration, training and use. Given the different nature of CRT, this bill also enhances quality standards by requiring CRT suppliers to be accredited by an independent organization and have qualified staff to service and repair beneficiaries' CRT products.

In addition, to help prevent fraud and abuse, this bill establishes clinical conditions for coverage that ensure products are prescribed appropriately. A licensed physical or occupational therapist with no financial relationship to the CRT supplier must provide a thorough evaluation. The legislation will also improve program safeguards by increasing quality standards for suppliers of CRT items. Each supplier must have qualified staff available to assist beneficiaries with training and repair for their CRT items. Suppliers must also be accredited by an independent accreditation organization demonstrating that they are compliant with these enhanced quality standards.

Thank you for your commitment to people living with disabilities and for supporting their independence through the introduction of the *Ensuring Access to Quality Complex Rehabilitation Technology Act*. The undersigned organizations of CCD strongly support this bipartisan legislation and look forward to continuing to work with you towards its passage.

Sincerely,

ACCSES

American Association of People with Disabilities (AAPD)

American Association on Health and Disability

American Medical Rehabilitation Providers Association

American Occupational Therapy Association (AOTA)

American Therapeutic Recreation Association (ATRA)

Amputee Coalition

Association for Education and Rehabilitation of the Blind and Visually Impaired

Association of Assistive Technology Act Programs

Association of University Centers on Disabilities (AUCD)

Autism Speaks

Brain Injury Association of America

Christopher & Dana Reeve Foundation

Disability Rights Education & Defense Fund (DREDF)

Easter Seals

Health & Disability Advocates

National Association of State Directors of Developmental Disabilities Services (NASDDDS)

National Association of State Head Injury Administrators (NASHIA)

National Disability Rights Network (NDRN)

National Multiple Sclerosis Society  
National Stroke Association  
Paralyzed Veterans of America (PVA)  
Perkins  
Rehabilitation Engineering and Assistive Technology Society of America  
The Arc  
The Myositis Association  
United Spinal Association