



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

August 19, 2014

Marilyn Tavenner, Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1614-P
P.O. Box 8016
Baltimore, MD 21244

RE: Coverage of Speech-Generating Devices

Dear Administrator Tavenner:

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for more than 173,000 audiologists, speech-language pathologists, speech, language, and hearing scientists, audiology and speech-language pathology support personnel, and students. We request that you immediately suspend the September 1, 2014, implementation of a Medicare coverage policy related to Speech Generating Devices (SGDs). This policy runs contrary to other CMS policies and puts vulnerable beneficiaries at risk of losing their only means to communicate, which could result in safety concerns and additional costs to the Medicare program. We understand that you have already heard from similarly concerned members of Congress and consumer groups regarding this issue.

Our over-arching concerns stem from several CMS directives related to SGDs

- The February 27, 2014, Coverage Reminder—Speech Generating Devices (SGDs) released by the DME Medicare Administrative Contractors significantly limits access to SGDs effective September 1, 2014, by disqualifying devices that are not solely dedicated to the production of speech. This policy prohibits beneficiaries from purchasing upgrades and enhancements at their own expense. CMS policy on SGDs runs contrary with other Medicare policies related to power wheelchairs, which allow beneficiaries to purchase additional upgrades at their own expense.
- The Coverage Reminder also limits accessibility to eye tracking technology, a necessary function of SGDs for patients with limited or no oral communication ability as well as mobility of the arms and hands.
- The application of the capped rental policy that went into effect April 1, 2014, can be changed according to CMS's own analysis.

CMS policies related to SGDs are discriminatory and place Medicare beneficiaries in need of these devices at risk. ASHA requests that CMS review and amend its current policies related to


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SGDs to ensure consistency with other policies for Durable Medical Equipment and to be sure they meet the need of the beneficiaries the Medicare program is intended to serve.

Should you have any questions regarding our request, please contact Lisa Satterfield, ASHA's director of health care regulatory advocacy, at lsatterfield@asha.org or Ingrida Lusic, ASHA's director of federal and political advocacy, at ilusic@asha.org.

Sincerely,



Elizabeth S. McCrea, PhD, CCC-SLP
2014 ASHA President

cc: Sylvia Mathews Burwell
Sean Cavanaugh
Laurence Wilson
Joel Kaiser
Stacey Brennan, MD
Robert D. Hoover, Jr., MD, MPH, FACP
Paul J. Hughes, MD
Eileen M. Moynihan, MD, FACP, FACR
The Honorable Fred Upton
The Honorable Cathy McMorris Rodgers
The Honorable Erik Paulsen
The Honorable Susan Collins