



GAO Report Validates Need for Passage of H.R. 3229 / S. 2196

Background

On June 1, 2016 the Government Accountability Office (GAO) released their report “Medicare: Utilization and Expenditures for Complex Wheelchair Accessories” to Congress. The report was required as part of the “Patient Access and Medicare Protection Act” (PAMPA) that was passed in December 2015. That legislation included a one year delay in the application of competitive bid pricing rates to accessories used with CRT power group 3 wheelchairs.

The GAO report focused on: (1) the utilization and expenditures for Medicare wheelchairs and accessories, in particular for Complex Rehabilitation Technology (CRT) power group 3 wheelchairs and the accessories used with them; and (2) how the 2016 Competitive Bid Program (CBP) adjusted payment rates for accessories, in particular those furnished in connection with CRT power group 3 wheelchairs, compare to the 2016 unadjusted fee schedule payment rates for the same items.

The report states Medicare provides coverage for a total of 73 types of wheelchairs and 193 types of wheelchair accessories. Total 2014 allowed charges for all wheelchairs were \$309 million and for all wheelchair accessories were \$311 million.

The 73 wheelchair codes were categorized into 5 types: (1) CRT power group 3 wheelchairs, (2) other CRT power wheelchairs - typically group 2, (3) CRT manual wheelchairs, (4) standard power wheelchairs, and (5) standard manual wheelchairs. The following is a summary of the reported 2014 allowed charges (Medicare paid 80% and beneficiaries were responsible for the remaining 20%) for wheelchairs and wheelchair accessories in dollars and units:

2014 Allowed Charges Information (in 000s)				
Category	Wheelchair \$	Accessories \$	Units- WC	Units- Access
CRT Power, Grp 3	\$ 69,000	\$ 159,000	13	312
CRT Power, Grp 2	\$ 6,000	\$ 13,000	2	35
CRT Manual	\$ 20,000	\$ 26,000	12	208
Subtotal	\$ 95,000	\$ 198,000	27	555
Standard Power	\$ 89,000	\$ 68,000	61	485
Standard Manual	\$ 125,000	\$ 45,000	515	693
Subtotal	\$ 214,000	\$ 113,000	576	1,178
All Categories	\$ 309,000	\$ 311,000	603	1,733

CRT-Only utilization data: Total 2014 allowed charges for CRT wheelchairs were \$95 million - CRT power wheelchairs were \$75 million (79%) and CRT manual wheelchairs were \$20 million (21%). Total allowed charges for CRT wheelchair accessories were \$198 million - CRT power wheelchair accessories were \$172 million (87%) and CRT manual wheelchair accessories were \$26 million (13%). The combined 2014 allowed charges for both CRT wheelchairs and CRT accessories was \$293 million.

Reductions due to inappropriate use of CBP information: Per the report, the 2016 CBP-adjusted payment rates for all wheelchair accessories are lower than the 2016 unadjusted fee schedule payment rates. Among the 10 accessories with the highest estimated expenditures when used with CRT power group 3 wheelchairs, 8 had CBP-adjusted payment rates, and the average 50/50 CBP-adjusted rates for these ranged from 5 to 17 percent lower than the unadjusted fee schedule payment rates. Using this GAO reported information, it is estimated that the difference between these rates will increase to at least 10 to 34 percent when 100 percent of the CBP-adjusted rates are implemented on July 1, 2016.

Report Information Supporting Passage of CRT Legislation

The information in the report validates the data shared with Congress last year by CRT stakeholders and supports the need for passage of H.R. 3229 / S. 2196 to prevent CMS from inappropriately applying CBP pricing information to CRT wheelchair accessories:

- The report recognizes that CRT wheelchairs include both CRT power wheelchairs and CRT manual wheelchairs.
- The report recognizes that CRT wheelchairs and accessories are required by people with high level disabilities.
- The report recognizes that CRT wheelchairs and accessories are different than standard wheelchairs and accessories. Enclosure 1 in the report highlights the wheelchair differences.
- The report recognizes that CRT accessories are important to ensure the CRT wheelchair can be individually configured to meet the specific needs of a person with a disability.
- The report recognizes that accessory codes contain both CRT and standard products and states they vary in price, characteristics and technology.
- The report recognizes that Congress passed legislation in 2008 to exclude CRT power wheelchairs and accessories from the Competitive Bidding Program.
- The report illustrates the CBP data CMS has for some CRT accessories is from 2009 and is very limited coming from only 9 of 109 bidding areas. That is not sufficient information for adjusting national payment rates.
- The report identifies the significant payment cuts that will result (ranging from 10% to 34%) should CMS inappropriately apply CBP pricing for accessories used with standard wheelchairs to those used with CRT wheelchairs.

Congressional Action Needed in 2016 to Protect Access

To protect access to Complex Rehab Technology wheelchair accessories (critical components) for Medicare beneficiaries and other people with disabilities Congress must pass H.R. 3229 and S. 2196. This legislation clarifies that CMS cannot apply Competitive Bid Program pricing information to accessories used with Complex Rehab Technology power and manual wheelchairs.

The National Coalition for Assistive and Rehab Technology (NCART) works to ensure individuals with disabilities have adequate access to Complex Rehab Technology and related supporting services. For additional information visit www.ncart.us or contact info@ncart.us.