

American Board for Certification in
Orthotics, Prosthetics & Pedorthics



JOINT STATEMENT

October 21, 2015

Washington, D.C. — A coalition of six consumer and provider national organizations expressed disappointment with the White House’s initial response to a “We the People” petition calling on the President to rescind Medicare’s Proposed/Draft Local Coverage Determination (LCD) for Lower Limb Prostheses (DL-33787), and pledged to continue working with the White House and the Centers for Medicare and Medicaid Services (CMS) to ensure continued patient access to modern prosthetic limbs.

The petition addresses a draft LCD issued by Medicare contractors on July 16, 2015. The draft document fundamentally alters how Medicare—and by extension, private insurers and the Veterans Administration—covers prosthetic limb care, seriously restricting patient access and essentially returning amputees to a 1970’s standard of care. The petition garnered over 100,000 signatures in 17 days.

Rather than responding to the petition’s request to rescind the draft LCD, the White House issued a brief “initial” response, stating that “the coverage process is still ongoing” and that they “understand the questions that have been raised about access to the right prosthetic care—including related technologies—for Medicare beneficiaries.”

The undersigned organizations reiterate our joint request that CMS immediately rescind this draft LCD and participate in a dialogue with consumer and provider stakeholders to discuss appropriate coverage guidance for prosthetic limbs. Rescission of this draft LCD is critical due to the fact that it is out of sync with contemporary prosthetic practice and because private payers like United Healthcare are already adopting elements of this draft LCD as if it were final Medicare policy, inappropriately restricting coverage for amputees covered by private plans. In addition, the Veterans Administration has also requested that CMS rescind the policy “in its entirety” due to its impact on veteran amputees.

Had CMS and its contractors developed the draft LCD in an open manner with stakeholder input, it would never have issued a coverage policy so severely lacking in supporting evidence and so destructive to current standards of amputee care. We take CMS and its contractors at their word that they will meaningfully consult with stakeholders before issuing any final coverage policy in this area—including another formal comment period—and we look forward to continuing to

work with them to ensure that all individuals with limb loss have access to appropriate prosthetic care.

The six organizations endorsing this statement represent—first and foremost—patients who use prosthetic limbs, as well as the clinicians, manufacturers, suppliers, researchers, educators, and accreditors serving patients with limb loss.

Please contact Peter Thomas at 202-455-6550 or Peter.Thomas@ppsv.com for further information.

The undersigned organizations endorse this statement:



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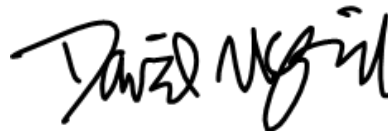
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