

Comments of the Association of University Centers on Disabilities (AUCD)

SUBMITTED ELECTRONICALLY via CMS.gov

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

RE: National Coverage Determination 50.1: Speech-Generating Devices (SGDs)

Date: 05/29/2015

The Association of University Centers on Disabilities (AUCD) is pleased to comment on the recently released draft National Coverage Determination (NCD) on speech generating devices (SGDs). AUCD is a non-profit national organization representing over 100 university centers that conduct research, provide interdisciplinary training and education, and provide direct services for and with people with developmental and other disabilities.

AUCD commends CMS for responding to the concerns of the more than 2000 people who participated in the prior comment period, including the "voices" of people who are unable to speak. The NCD draft as written will go far to promote access to SGDs for eligible Medicare beneficiaries for whom these devices provide a huge difference. In particular, CMS's careful consideration of what comprises communication in the 21st century and its subsequent expansion of the definition of "speech" to include forms of remote communication via texting, email, and telephone is timely and entirely appropriate. Individuals with the most severe disabilities rely on these technologies for independence, to sustain relationships, and to direct their healthcare.

We are also pleased that CMS recognizes the importance of providing access to non-communication related capabilities of these devices AT THE BENEFICIARIES' expense, and the fact that these features are part and parcel of modern technologies.

We encourage adoption of a final revised NCD that includes the aforementioned improvement. During the last months, individuals with complex communication needs and the people who serve and support them have faced uncertainty and confusion. A new NCD will go far to assuage that harm.

AUCD also look forward to a remedy to the other issues facing SGD users in 2014-2015, namely capped rental and CMS' non-payment of eye gaze access technologies.

Thank you for this opportunity to provide comments. If you have any questions, please contact Kim Musheno at kmusheno@aucd.org