



October 6, 2003

VIA FEDERAL EXPRESS AND FACSIMILE

Dara Corrigan
Acting Principal Deputy Inspector General
Office of Inspector General
Department of Health and Human Services
Room 5541 Cohen Building
330 Independence Avenue, S.W.
Washington, D.C. 20201

Re: CMS 10-Point Plan and OIG Investigation to Combat Fraud and Abuse in the Power Wheelchair Benefit Under Medicare.

Dear Ms. Corrigan:

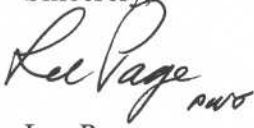
This letter is submitted on behalf of a national, consumer-led coalition known as the "ITEM" Coalition, which is an acronym for Independence Through Enhancement of Medicare and Medicaid. The ITEM Coalition was formed in 2003, and its over 70 member organizations include a diverse set of disability organizations, aging organizations, other consumer groups, labor organizations, voluntary health associations, and non-profit provider associations. The ITEM Coalition's purpose is to raise awareness and build support for policies that will improve access to assistive devices, technologies and related services for people of all ages with disabilities and chronic conditions.

The ITEM Coalition welcomes the federal government's 10-Point Plan to combat fraud and abuse in the purchase of power wheelchairs under Medicare's durable medical equipment benefit, as scarce resources are needed to promote beneficiary access to much needed rehabilitation equipment and assistive technologies. At the same time, we urge your caution in implementing this anti-fraud and abuse initiative to prevent unintended consequences and inappropriate denials of legitimate claims. We are concerned that well-meaning efforts to root out fraud and abuse may lead to coverage denials or significant delays in obtaining necessary equipment even in cases where ample documentation supporting the need for power mobility devices exists.

To prevent harm to beneficiaries, we urge the OIG to closely monitor and study the impact that CMS's 10-Point Plan and the OIG's enforcement efforts have on legitimate beneficiary access to power mobility devices.

Thank you for your initiative to reduce fraudulent claims under the Medicare power wheelchair benefit. Every dollar saved on fraudulent and abusive activity can be devoted to meeting existing and future needs of beneficiaries with disabilities and chronic conditions.

Sincerely,

A handwritten signature in cursive script that reads "Lee Page" with the initials "LWP" written below it.

Lee Page
Paralyzed Veterans of America
ITEM Coalition Steering Committee Member

Other Steering Committee Member Organizations

American Foundation for the Blind
Advancing Independence: Modernizing Medicare and Medicaid
Consortium for Citizens with Disabilities Health Task Force
Medicare Rights Center

Cc: Tom Scully, Administrator, Centers for Medicare and Medicaid Services

Attachment: List of ITEM Coalition Members