Ms. Seema Verma,  
Administrator, Centers for Medicare & Medicaid Services  
200 Independence Ave., S.W., Washington, D.C.  

RE: Competitive Bidding Product Categories – Ventilators  

The ALS Association strongly opposes adding ventilators to the competitive bidding process. Because the majority of people diagnosed with ALS die of respiratory failure, it is critical that they have access to medically necessary ventilators and respiratory therapists so that they can avoid the cost and consequences of institutional care. The use of competitive bidding will harm people with ALS as well as result in higher costs for Medicare and state Medicaid programs that model their programs on Medicare.

The ALS Association is the only national nonprofit organization fighting this devastating disease on all fronts. We are a recognized leader in U.S. and global research. Our nationwide network of certified medical facilities provides state-of-the-art, multidisciplinary ALS care to more than 20,000 people with ALS. And our ALS chapters across all states provide direct and critically important support to people living with ALS and their families.

People with ALS who receive home ventilation care are the most vulnerable and fragile patients in home health. Ventilators require constant vigilance and adjustment as a patient’s needs change, as well as frequent maintenance. Respiratory therapists are not reimbursed by CMS, which requires the durable medical equipment (DME) suppliers to subsidize the cost of care to keep patients at home. Only very few providers in any market possess the skills and commitment necessary to keep people living with ALS safely at home.

Competitive bidding will result in a devastating reduction in access to both ventilators and skilled respiratory therapists. If this happens, people with ALS will experience life-threatening lapses in their ventilatory care, drastic increases in emergency room visits, and more frequent and longer admissions to hospitals, as well as greater use of skilled nursing facilities and long-term care institutions.

We strongly oppose including ventilators in the competitive bidding process because it will harm people with ALS by reducing access to life-saving equipment and respiratory therapists and increasing costs for Medicare beneficiaries and the Medicare program.

Submitted by The ALS Association on December 14, 2018

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