

## **CMS Final HCPCS Coding Decision**

We appreciate the comments provided in response to CMS' published preliminary HCPCS coding recommendation. Based on the information provided in the application and after consideration of the comments we received, CMS is finalizing part of its preliminary recommendations to:

1. Discontinue existing HCPCS Level II code E2300, "Wheelchair accessory, power seat elevation system, any type" Effective March 31, 2024
2. Establish E2298, "Complex rehabilitative power wheelchair accessory, power seat elevation system, any type" Effective April 1, 2024

Based on the public consultation, CMS is deferring creation of a new HCPCS Level II code for power seat elevation equipment used with non-complex rehabilitative power wheelchairs.

In the interim, HCPCS Level II codes **K0830 and K0831 will continue to be used for non-complex** rehabilitative power wheelchairs with seat elevation equipment. **HCPCS Level II code K0108 ("Wheelchair component or accessory, not otherwise specified") can be used for claims for power seat elevation equipment added onto a non-complex rehabilitative power wheelchair owned by the beneficiary.**

## **Final Medicare Payment Determination**

With respect to the HCPCS Level II code, **E2298, "Complex rehabilitative power wheelchair accessory, power seat elevation system, any type."** We appreciate the public comments provided in response to CMS's published preliminary payment determination. We recognize that seat elevation equipment for a bariatric patient population necessarily requires special attention to ensure that components are fabricated with the necessary specifications and that the seat elevation equipment meets stability testing requirements. However, the public comments confirmed that regardless of any differences in fabrication cost, there is no significant difference in the commercial pricing for seat elevation equipment for heavy duty power wheelchairs and seat elevation equipment for standard power wheelchairs. As discussed in the preliminary determination, there are a number of important differences between power seat elevation equipment and power seat tilt equipment. Although both functions are intended to support patients with their mobility-related medical needs, the similarity goes no further. For new HCPCS Level II codes for items and services without a fee schedule pricing history we use the existing fee schedule amounts for comparable items when these items are determined to be comparable to the new items and services based on a comparison of: physical components, mechanical components, electrical components, function and intended use, and additional attributes and features. Power seat elevation and tilt perform two fundamentally different functions: the former changes the vertical position of the seat while the latter changes the angle of the seat. These differing motions necessitate different physical and mechanical components. Various diagrams and written comments submitted to CMS support the differing stability implications of seat elevation and seat tilt. CMS continues to believe that power seat elevation and power seat tilt are not comparable for purposes of determining a Medicare payment amount. As discussed in the preliminary payment determination, we compiled a list of all complex rehabilitative wheelchairs with power seat elevation options available on the Product Classification List for the relevant base wheelchair

codes. While we made efforts to ensure the comprehensive nature of this list, the written public comments identified a number of other power wheelchair models with seat elevation equipment options that should be included. The complete list, including the additional power seat elevation options provided in the written comments, is in the table below.

### **Final List of Complex Rehabilitative Wheelchairs with Power Seat Elevation Equipment**

Alltrack M3 Alltrack M3 HD Alltrack R3 Alltrack R3 HD Alltrack P3 F3 Corpus F3 Corpus HD F5 141 Frontier V6 M Corpus VS M3 Magic 360 TDX SP2 Aviva Storm Rx Aviva FX Quantum Rehab Q6 Rovi A3 Rovi X3 Q6 Edge Q6 Edge X Q6 Edge 3 Q6 Edge 3 Stretto Q6 Edge Z R-Trak Quantum Rival 3 Quantum 4Front 2 Quickie Q300 Quickie Q500 Quickie Q700 Std Quickie Q700 HD Velocity

Additionally, the written comments described an average MSRP that was significantly higher than average pricing that had been used in the preliminary payment determination. We reiterate that MSRPs do not, in and of themselves, represent prices at which commercial transactions take place; for this reason, MSRPs are not acceptable for use in gap-filling purposes. For each wheelchair model listed in the table above, we searched for the best internet pricing available for seat elevation equipment, following the methodology described in the preliminary payment determination. For some of these models, the commercial pricing we found is the same as the MSRP; for other models, we identified commercial pricing that was lower than the MSRP. The average of the commercial prices of the models listed in the above table was \$3,073.10. The annual deflation factors are specified in program instructions and the deflated amounts are then increased by the update factors specified in section 1834(a)(14) of the Act for DME. Based on these adjustments, the 2024 purchase price would be **approximately \$2,000.34**. Under the capped rental rules for complex rehabilitative power wheelchairs, the rental price would be approximately \$200 for months 1-3 and \$150 for months 4-13 for a total of \$2,100 for 13 months of continuous use. Pricing Indicator = 36

With respect to code K0830 and K0831, and claims for power seat elevation equipment added onto a non-complex rehabilitative power wheelchair owned by the beneficiary that are billed using code K0108, local fee schedule amounts would be calculated by the DME MACs for use in paying claims for any covered items. Pricing Indicator = 36