

March 24, 2026

Dr. Mehmet Oz
Administrator
Centers for Medicare & Medicaid Services (CMS)
7500 Security Blvd
Baltimore, MD 21244

Re: Proposal to Remove Seat Elevation Coverage for Individuals Using Group 2 Power Wheelchairs

Dear Administrator Oz:

On behalf of children and adults with spinal muscular atrophy (SMA), **Cure SMA writes to express concern regarding the CMS local coverage determination (LCD) proposal related to seat elevation systems in Group 2 power wheelchairs.**ⁱ Seat elevation systems remain a vital feature in power wheelchairs for people with SMA. Therefore, we urge CMS to maintain its 2023 national coverage determination (NCD) for Group 2 wheelchairs,ⁱⁱ which determined that seat elevation systems are “reasonable and necessary,” regardless of power wheelchairs type.

SMA is a progressive neuromuscular disease that weakens muscles throughout the body, including those needed for mobility, transfers, and daily activities. Many individuals with SMA rely on power wheelchairs for mobility due to loss of ambulation and limited upper-body strength. As one **person with SMA** described, *“Wheelchairs are our legs. Wheelchairs are a lifeline. Wheelchairs are independence.”*

People with SMA view seat elevation systems as a necessity, not an accessory, in their power wheelchairs. **More than 95 percent of wheelchair users with SMA who responded to a recent Cure SMA survey reported using their seat elevator “multiple times a day.”** The remaining respondents reported using the system a *“few times a week.”* Individuals with SMA report that seat elevation systems are used frequently to support both health-related needs and everyday activities.

Seat Elevation Systems are Necessary for Health and Safety

Individuals with SMA use seat elevation to prevent injuries and support essential healthcare needs. Due to severe muscle weakness, people with SMA often require assistance when transferring to beds, toilets, exam tables, or other surfaces without adjustable seat height. One **woman with SMA** explained that *“seat elevators are essential for the safety of both parties during transfers, and these transfers happen multiple times per day. It reduces injuries caused by drops or other transfer challenges.”* Another **adult with SMA** shared, *“When I’m out in the community, I can elevate so that I’m high enough for everyone to see me. I once had a shoulder dislocated because someone wasn’t looking down and tripped over me and caused me grave injuries.”*

Seat elevation systems also support hygiene, nutrition, and access to healthcare. An **adult with SMA** who uses seat elevation multiple times a day said, *“I would not be able to feed*

myself at certain tables, which would seriously impair my nutrition.” Another **individual with SMA** noted, “It also helps me reach the bathroom sink to wash my hands.” One **adult with SMA** shared, “I find it easier at doctors’ offices to have tests done with my elevator on my chair.” Similarly, an **older adult with SMA** said, “I plan to use my seat elevator at the dentist, dermatologist, gynecologist, for my mammogram, and other upcoming medical appointments (or ER visits) to facilitate my healthcare interactions.”

Reducing injuries and illnesses can also decrease the need for additional healthcare and caregiving services. A **70-year-old adult with SMA** explained, “There is also a greater possibility that I would drop hot food onto myself (from the microwave) or pull a muscle reaching out or over if I cannot access appliances at the correct height using my seat elevator. Any injury can be dangerous for me because of my slow healing and advanced age.” Another **individual with SMA** said, “Having access to my staff at a higher level, ensures my health and safety when I aspirate, staff can reach me and access me much quicker and safer.”

Seat Elevation Systems Support Daily Functioning and Independence

Seat elevation allows individuals to reach objects, interact with others at eye level, and participate in daily activities such as cooking, working, or attending school. **One person with SMA who reported using a Group 2 wheelchair** noted, “It makes it easier to adjust to table heights in restaurants, helps with transfers, helps reach light switches—it is useful for everything in daily life.” A **young woman with SMA** said, “It allows me to feel like an equal participant in conversations with people who are standing.” Another **adult with SMA** shared that her seat elevator “allows me to reach the bathroom faucet for personal care and to give me access to the cupboards, refrigerator freezer and kitchen microwave so I can fix my own daily meals and drinks without relying on a caregiver.”

Concern for the Safety, Health, and Independence of Group 2 Wheelchair Users

Cure SMA and the SMA community strongly supported the CMS 2023 NCD that determined seat elevation systems were medically necessary for power wheelchairs across Groups 2 to 5. The proposed LCD that removes this coverage certainty for Group 2 wheelchair users is concerning, particularly for individuals with SMA, a disease that worsens over time.

Cure SMA is concerned about the scenario in which a partially ambulatory person with SMA is denied a seat elevation system during an LCD review but subsequently experiences an injury, illness, or progression of the disease that rapidly reduces mobility. In such cases, the individual could lose further independence because their wheelchair lacks this essential feature. One **adult with SMA who uses a Group 2 wheelchair** said, “My disability has progressed and now I rely on my seat elevator heavily.”

Seat elevation systems are essential for performing activities of daily living safely while helping to prevent injury and illness. The same **Group 2 wheelchair user with SMA** added, “If I didn’t have it, I could not live independently. I would need help with nearly everything. I could not transfer. I can’t reach things. I could not get to work. I could not use the restroom independently.” Under the CMS proposal, individuals like her may have to live without this feature depending on their local administrator’s review, solely because the wheelchair they use falls within Group 2 rather than Groups 3, 4 or 5. An **adult with SMA who can stand and walk short distance**, but reports using a mobility device for moderate and extended distances

said, “A seat elevator allows me to transfer from seated to standing without hand-crawling up furniture or requiring assistance from a caregiver with my transfer belt. It’s safer for me to use a seat elevator, decreasing the risk of a fall, eases caregiver burden and allows me more freedom to transfer from sitting to standing more often. The benefit of a seat elevator is immense.”

Conclusion

Cure SMA respectfully urges CMS to maintain its 2023 national coverage determination that seat elevation systems for Group 2 power wheelchairs are “reasonable and necessary” and therefore should be covered by insurance. Preserving this coverage will help ensure that Medicare beneficiaries and others with mobility impairments retain access to technology that enables independence, safety, and quality of life. For people with SMA, seat elevation systems are not convenience features, they are necessary tools that enable safe transfers, reduce caregiver dependence, and support independent living. As one **adult with SMA** summed up, “My safety is paramount. I truly do not know how I could live my life without the seat elevator.”

Thank you for considering the views of the SMA community. For more information, please contact Maynard Friesz, Vice President of Policy & Advocacy at Cure SMA, at maynard.friesz@curesma.org or 202-871-8004.

Sincerely,



Kenneth Hobby
President



Maynard Friesz
Vice President, Policy

ⁱ CMS Proposed LCD for Seat Elevation Coverage in Group 2 Wheelchairs; <https://www.cms.gov/medicare-coverage-database/view/lcd.aspx?lcdid=40344&ver=12&bc=0>

ⁱⁱ Cure SMA responds to CMS Proposed NCD on Seat Elevation Systems; <https://d3dkdvqff0zqx.cloudfront.net/groups/curesma/attachments/Cure-SMA-Public-Comment-on-Coverage-of-Seat-Elevation-Systems.pdf>