



SENT VIA EMAIL

March 27, 2018

The Honorable Seema Verma
Administrator
Centers for Medicare and Medicaid Services
200 Independence Avenue, SW
Washington, DC 20001

Dear Administrator Verma:

On behalf of the National Federation of the Blind and the Diabetes Action Network, we write to request a review and reconsideration of coverage policies related to durable medical equipment for the management and mitigation of diabetes. Such devices include glucometers, continuous glucose monitoring systems (CGM), and insulin pumps, among others. Current coverage policies by the Centers for Medicare and Medicaid Services do not take into consideration the accessibility of those devices and as a result, millions of blind and low-vision diabetics lack sufficient access to life-saving medical tools.

The overlap between the aging, blind, and diabetic populations is large and increasing steadily. Aging is accompanied by a disproportionately high incidence rate of diabetes (25.2 percent for adults over the age of sixty-five)¹ and the incidence rate of eye diseases and blindness also increases rapidly with age.² Visual impairment is also overrepresented in the diabetic population.³ There are thirty million Americans with diabetes and diabetes is the leading cause of new cases of blindness, often through the onset of diabetic retinopathy (DR) or vision-threatening diabetic retinopathy (VTDR).⁴ These convergent demographic and public health trends mean that the population of blind and low-vision diabetics is increasing rapidly. The Centers for Disease Control estimate that the current 5.5 million Americans with DR will rise by nearly 300 percent to 16 million by the year 2050 and those with VTDR will increase to 3.4 million.⁵

Coverage policies at CMS can impact this situation in different ways. For example, some forward-thinking manufacturers have developed smartphone apps that can be paired with CGM devices, thereby rendering those previously inaccessible devices accessible to blind and low-vision diabetics. Despite this positive innovation, CMS recently rendered a policy decision that prohibits Medicare from covering CGM devices when the CGM device is used in conjunction with a smartphone app.⁶ This example highlights a gap in CMS policy where coverage policy reforms could dramatically improve access to vital medical resources and better health outcomes.

As the largest organization of blind people and an organization comprised entirely of blind diabetics and their families, the National Federation of the Blind and the Diabetes Action Network, a division of the National Federation of the Blind, share a mutual concern with this critical issue. Our members deserve access to the technologies and devices that will allow them to safely and securely monitor their glucose levels and avoid diabetes-related health incidents, such as hypoglycemia. In the current environment marked by an almost complete lack of accessible devices and technologies, they do not have that access and their lives are at risk everyday as a result. We therefore call on CMS to review and revise its coverage policies and work toward promoting more accessibility and improved health outcomes.

Sincerely,



Mark A. Riccobono, President
National Federation of the Blind



Bernadette Jacobs
President
Diabetes Action Network

¹ "Statistics About Diabetes," American Diabetes Association, accessed March 15, 2018, <http://www.diabetes.org/diabetes-basics/statistics/>

² "Vision Health and Age | Risk | VI | CDC," Centers for Disease Control, accessed on March 13, 2018, <https://www.cdc.gov/visionhealth/risk/age.htm>

³ "National Data," Centers for Disease Control, accessed on March 2, 2018, <https://www.cdc.gov/visionhealth/data/national.htm>

⁴ "Diabetic Retinopathy (factsheet)," Centers for Disease Control, accessed on March 6, 2018, <https://www.cdc.gov/visionhealth/pdf/factsheet.pdf>

⁵ "Diabetic Retinopathy | Vision Health Initiative (VI) | CDC.gov," Centers for Disease Control, accessed on March 16, 2018, https://www.cdc.gov/visionhealth/publications/diabetic_retinopathy.htm

⁶ "Current Procedural Terminology (CPT) and National Uniform billing Committee (NUBC) Licenses," Center for Medicare and Medicaid Services (CMS), accessed on March 15, 2018, <https://www.cms.gov/medicare-coverage-database/license/cpt-license.aspx?from=~/overview-and-quick-search.aspx&npage=/medicare-coverage-database/details/article-details.aspx&articleid=52464+>