

# American Medical Association

Physicians dedicated to the health of America



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March 21, 2000

Hugh Hill, MD  
Acting Director  
Coverage and Analysis Group  
Office of Clinical Standards and Quality  
Health Care Financing Administration  
7500 Security Boulevard  
Baltimore, Maryland 21244

Dear Dr. Hill:

The American Medical Association (AMA) is pleased to provide comments in support of the Formal Request for National Coverage Decision for Augmentative and Alternative Communication Devices (AAC). The AMA agrees with the American Academy of Neurology that these devices are medically necessary for severely speech-impaired patients to meet the communication needs arising in the course of their daily activities. We understand that the American Academy of Physical Medicine and Rehabilitation will also be submitting comments supporting coverage.

As you know from our previous comments at the Medicare Coverage Advisory Committee, we appreciate the commitment made by the advisors and the Health Care Financing Administration (HCFA) to ensure that coverage decisions will be grounded in scientific evidence of clinical effectiveness.

In the Formal Request for National Coverage Decision for Augmentative and Alternative Communication Devices, Section 3: Clinical Aspects of AAC Devices, there is an excellent summary of the strong clinical evidence for the efficacy and effectiveness of AAC devices for the treatment of dysarthria, apraxia, and aphasia. The clinical decision-making process is appropriately outlined in this Section and is consistent with the proposed coverage criteria in Section 6.

Treating patients with severe communication impairments with AAC devices is an accepted standard of practice as can be seen in the 1997 ALS (Amyotrophic Lateral Sclerosis) Standard of Care Consensus Conference documented in Vol. 48 of the *Journal of Neurology*, Supplement 4:S15-22:1997. Although AAC devices appear too slow and cumbersome for anyone who can make themselves understood (even with impaired speech), this equipment makes it possible for those who cannot be understood, to communicate their basic daily needs, ask for help, and maintain some independence.

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The American Medical Association has policy in support of coverage for medical devices such as ACC devices. In AMA Policies H-480.990, The Transfer of Technology, paragraph two states, "Public and private payors should make coverage available for any costly technology that can be demonstrated to improve health or quality of life and that is cost-effective. Coverage decisions by payors should be based on clear criteria for clinical indications and contraindications".

The AMA considers these devices as medically necessary and appropriate for carefully selected patients and we support the formal request for coverage.

Respectfully,



E. Ratcliffe Anderson, Jr., MD