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May 20, 2015

BY ELECTRONIC DELIVERY

Subash Duggirala, MD
Lead Medical Officer
Centers for Medicare and Medicaid Services
Mail Stop C1-09-06
7500 Security Boulevard
Baltimore, Maryland 21244-1850

RE: Medicare Program; Proposed Scope of Benefit NCD: Speech Generating Devices

Dear Dr. Duggirala:

On behalf of the Association of Community Cancer Centers (ACCC), we appreciate this opportunity to comment on the Centers for Medicare & Medicaid Services' (CMS) proposed decision memorandum regarding coverage of speech generating devices.

ACCC represents more than 20,000 cancer care professionals from approximately 1,100 hospitals and more than 1,000 private practices nationwide. These include Cancer Program Members, Individual Members, and members from 32 state oncology societies. It is estimated that 60 percent of cancer patients nationwide are treated by a member of ACCC. Similar to the Centers for Medicare & Medicaid Services (CMS), ACCC is committed to improving health outcomes for Medicare beneficiaries.

ACCC applauds CMS's proposal to expand coverage of speech generating devices to include new technologies. Neck and throat cancer patients that have lost the ability to speak must rely upon devices that produce speech or text to communicate their needs. Patient quality of care and health outcomes can be improved through easier communication methods. ACCC also supports the decision to extend coverage to devices allowing remote communication. Communication with health care providers and care givers, present or remote, allows patients to convey their needs and avoid health complications associated with delayed discovery.

ACCC appreciates the opportunity to submit these comments and CMS's ongoing efforts to expand coverage of speech generating devices. If you have any questions, or if ACCC can be of further assistance, please contact Leah Ralph, Manager of Provider Economics and Public Policy, at 301-984-5071. Thank you again for your consideration of this issue.

Sincerely,



Steven D'Amato, BSPHarm, BCOP
President
Association of Community Cancer Centers