



April 19, 2018

Ms. Seema Verma  
Administrator  
Centers for Medicare and Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244

Dear Administrator Verma:

The Diabetes Advocacy Alliance (DAA) is writing to ask for reconsideration of the current coverage policy for therapeutic Continuous Glucose Monitors (CGMs). The DAA is very concerned that the coverage determination as written does not allow patients to use smart phone technology to access their own glucose data or share this data with family, caregivers, and healthcare professionals. This functionality is a key safety feature of CGMs, particularly for older patients who have severe or recurring hypoglycemia or hypoglycemia unawareness. Prohibiting seniors from utilizing this valuable feature of therapeutic CGMs is clinically challenging for health care providers and may result in avoidable emergency room visits and hospitalizations.

The DAA is a coalition of 24 diverse member organizations, representing patient, professional and trade associations, other non-profit organizations, and corporations, all united in the desire to change the way diabetes is viewed and treated in America. Since 2010, the DAA has worked to increase awareness of, and action on, the diabetes epidemic among legislators and policymakers. The organizations that comprise the DAA share a common goal of elevating diabetes on the national agenda so we may ultimately defeat diabetes.

The Department of Health and Human Services recognized what a dangerous and costly complication hypoglycemia poses to patients and our healthcare system when they identified it as one of the top three preventable adverse drug events in its National Action Plan. CGM and its mobile application provide alarm notification to patients and/or caregivers of decreasing blood glucose and hypoglycemia so that action can be taken to manage the event and avoid seizure, coma, or death which can occur in extreme cases when hypoglycemia is not recognized and treated. Allowing beneficiaries to use smart devices and applications will enable them to better manage their condition and will save Medicare money because of fewer acute events. The DAA is concerned that the current coverage determination prohibiting the use of mobile application is a barrier to patient safety and preventable hypoglycemia events. Since Medicare beneficiaries and/or their caregivers use their own smart phones to enable this feature, CMS reimbursement for smart phones is not an issue.

We strongly urge CMS to reevaluate and reconsider the current CGM coverage determination to allow use of this important technology. Thank you for your consideration. If you have any questions or need additional information, please free to contact Amy Wotring at [awot@novonordisk.com](mailto:awot@novonordisk.com).

Sincerely,

Meredith Dyer  
Endocrine Society  
DAA Co-Chair

Karin Gillespie  
Novo Nordisk Inc.  
DAA Co-Chair

Meghan Riley  
American Diabetes Association  
DAA Co-Chair