

Get LUCI Funded

This is a clinician's guide for writing a letter of medical necessity (LMN), where the second half provides a special focus on justifying the LUCI system on a Group 3 power wheelchair.

LUCI is typically submitted under the "Miscellaneous Code," or HCPCS K0108, defined as "a wheelchair component or accessory, not otherwise specified." **Because K0108 does not carry predefined coverage criteria, reviewers rely entirely on the clinician's documentation to determine medical necessity.** Because of this, it's critical to provide the level of detail outlined below to show how LUCI can ameliorate the client's functional limitations and **demonstrate how LUCI is medically necessary to support independence and participation.**

If you are new to writing LMN's, pages 1-4 of this guide provides a general structure that follows best clinical practice. If you are a clinician experienced in LMN writing but are seeking guidance in justifying the LUCI system, you may want to jump straight to the *Justifying LUCI in an LMN* portion of this document on page 5. You can access even more resources, example LMN's, and outcome measure tests at www.luci.com/funding/.

Sample LMN Structure

Name:
Age:
Date of Birth:
Diagnosis:
Date of Evaluation:
Insurance / Payor:
Equipment Supplier / ATP Present:

Relevant Background

All background information should be considered in the context of the client's need for power mobility.

Include a complete description of:

- » The client's diagnoses and resultant impairments impacting mobility. Any additional relevant medical history, e.g., a history of pressure injuries, clinical progression of the diagnosis, pain, cardiac or respiratory issues, etc.;
- » Living environment, life roles and responsibilities;
- » Current functional status resulting in the need for a mobility evaluation;
- » Any prosthetics, orthotics, and/or splints used by the client as these can impact components needed on the chair and seating system. If the client is already using a power chair, briefly indicate their current use and why a new chair is being requested.
- » Any relevant vision, cognition, communication, or processing that may impact the client's mobility

Please ensure that [BOLDED AREAS] are tailored to your client. Using the client's name, correct pronouns, and real examples from their life and experience help the reviewer understand the letter is about a real person.

- or ability to operate the prescribed equipment, and;
- » Any relevant past and/or planned surgeries.

Specialized Seating and Mobility Evaluation

Include additional relevant client information that contributes to seating and wheeled mobility needs here.

Physical Exam

Include the results of the supine and seated assessment conducted outside of the wheelchair. Describe sitting balance, postural support needs, sensation, range of motion, strength, coordination, joint integrity, tone and/or spasticity, primitive reflexes (if present), skin integrity, and any postural asymmetries. Include all measurements taken that will impact the requested equipment (e.g., hip width, upper leg length).

Functional Assessment

Describe the individual's mobility status leading to the need for power mobility with LUCI. List current status of participation in life roles and daily activities (e.g. work, school, play) and **mobility related activities of daily living (MRADL's)**, such as dressing, eating, hygiene, toileting, bathing, bowel + bladder management, etc. Are these MRADL's performed from the wheelchair? Describe current limitations that new equipment may address - this sets you up to later connect the equipment being requested with increased independence in MRADL's, which is critical in justifying the new equipment. Describe how the client performs transfers and the current assistance level required. If the client does ambulate, describe under what circumstances and in what environments, what distance they can ambulate, and wver what period of time. Is ambulation functional in all routine environments? If not, when and WHY would a power chair increase mobility and functionality.

MRADL's is a term used by payors. However, we know that MRADL's should not be the only or ultimate goal for your client. Instead, consider mobility success across the spectrum of their life.

Environmental Assessment

- » Describe the client's current living situation and home environment, e.g., living alone or with family/caregiver, single story home with ramp, independent living facility, 3rd floor apartment with an elevator.
- » Note accessibility of entrances and exits as well as accessibility within the home.
- » Include any outdoor terrain the client navigates, e.g., curb cuts, farmland, cobblestone.
- » Address any mobility needs and/or limitations in the community, e.g., at work, school, religious environment, medical buildings for appointments.
- » Finally, include information about transportation options, e.g., public transportation, personal wheelchair accessible vehicle, school bus.

Any Current Equipment

If the client already has mobility equipment, detail the following topics and then explain why the current equipment is no longer meeting their needs.

- » Current seating system: Include manufacturer, model, age of equipment and posture in the current system, e.g., power seating functions, back support, cushion, or postural supports.
- » List any costly repairs needed on current equipment. Is it in a state of disrepair? Does the cost of repairs warrant purchase of a new wheelchair?
- » Specify all known reasons why the current equipment is NOT meeting the client's medical and/or functional mobility needs in the home and/or community. For example, describe areas in the home, community, or when navigating transportation where the client is:
 - » Experiencing challenges when driving the power wheelchair.
 - » Not driving the power wheelchair due to lack of confidence, inefficiency, or safety concerns.

- » Not permitted to drive the power wheelchair due to past collisions, tip-overs, or concerns for others' safety and/or the environment.

Goals of Recommended Equipment

Include goals specific to the client that support increased independence, confidence, efficiency, and safety in mobility, with MRADL's, and with any functional tasks in the home and community.

For example:

- » Client will be independent and efficient in driving the power wheelchair with the LUCI system compensating for **[VISUAL DEFICITS, INATTENTION, DELAYED REACTION TIME, SPASTICITY, TONE, FATIGUE, ETC.]** in necessary home and community environments.
- » Client will have the confidence to independently and efficiently drive the power wheelchair with LUCI while maintaining safety for themselves and others in the **[ENVIRONMENT SPECIFIC TO THE CLIENT]**.

Equipment Recommendations + Justification

The equipment supplier will provide you with a full list of components requiring justification.

1. Requested power wheelchair and requested components: Include manufacturer name and model.
2. Requested power seat functions: Separate justification is required for each recommended power seat function.
3. Requested seating components: Include manufacturer name(s) and model of cushion, back support, and requested positioning components that are a part of the seating system, e.g., 4-point pelvic positioning belt, lateral trunk supports, lateral thigh supports, chest harness.
4. LUCI: refer to *Justifying LUCI in an LMN* (SEE PAGE 5) on linking LUCI to medical necessity to increase likelihood of approval.
5. Other accessories: Any other accessories that are not captured above that carry a charge will also need to be justified, e.g. phone holder, lights, tray.

Because a Group 3 power wheelchair base is needed to support LUCI, we have provided additional guidance on doing so in the next section.

This is based on Medicare guidelines. While most payors follow Medicare guidelines, it's important to understand nuances in the policies of the payor you are submitting to.

Justifying a Group 3 Power Wheelchair Base

You must rule out least costly alternatives including ambulation, manual wheeled mobility, and less costly power mobility options to demonstrate why the Group 3 power wheelchair is required.

1. Rule **OUT** ambulation:

- » Rule out ambulation as the primary means of self-directed mobility. Describe why walking is not efficient/effective all of the time.
- » Client has a mobility limitation that significantly impairs their ability to participate in one or more MRADL's such as **[TOILETING, FEEDING, DRESSING, GROOMING, AND/OR BATHING]** in customary locations in their home and other environments required for participation in life roles.
- » Client is non-ambulatory/is unable to functionally ambulate and is at risk for falling, even with an appropriately fitted assistive device such as a cane or walker.
- » Client is unable to ambulate with or without an appropriately fitted assistive device in a timely manner for completion of MRADL's in customary locations in their home.

2. Rule **OUT** manual wheeled mobility:

- » Client is unable to functionally and efficiently propel an optimally configured manual wheelchair due to weakness, decreased endurance, impaired UE/LE coordination, pain, impaired ROM, spasticity, etc.

3. Rule **OUT** a scooter or other power operated vehicles (POV's):

- » Client is unable to use a scooter/POV for functional mobility due to **[INADEQUATE BALANCE**

OR STABILITY, LACK OF SEATING AND POSITIONING OPTIONS, INABILITY TO SAFELY TRANSFER, INABILITY TO OPERATE TILLER CONTROL, ETC.]

- » The client's home does not provide adequate access between rooms, maneuvering space, and surfaces for the operation of a scooter/POV.

4. Rule OUT a Group 2 power wheelchair:

- » Include any of the following to explain why a Group 2 power wheelchair does not sufficiently meet your client's needs. A group 2 power wheelchair will not accommodate:
 - » The client's needed seating system/seating and positioning components;
 - » Their required power seat functions;
 - » Their required drive control;
 - » The chair does not have required battery life for all day use, and/or;
 - » The chair does not have needed stability and suspension to manage environments client needs to access. (Of note, suspension can contribute to spasticity management, tone, and positional control.)

5. Rule IN a Group 3 power wheelchair:

Client meets above general coverage criteria for a power mobility device AND all of the following:

- » Client has mental capabilities [**e.g. COGNITION, JUDGMENT**] and physical capabilities [**e.g., VISION, MOTOR CONTROL**] sufficient for safe mobility with the necessary power wheelchair accessories.
- » Client's home environment is accessible for the recommended power wheelchair.
- » Use of the recommended power wheelchair will significantly improve the client's ability to participate in MRADL's in the home.
- » Client has expressed a willingness to utilize the recommended power wheelchair in their home and necessary community environments.
- » Client's weight is less than or equal to the weight capacity of the recommended chair.
- » Client has a mobility limitation due to a neurological condition, myopathy, or congenital skeletal deformity.
- » Additional client needs that may help further justify Group 3:
 - » Client requires expandable electronics due to a need for an alternative drive control, for requested power seat functions, and/or to support the LUCI system.
 - » A longer battery life is needed for continuous, all-day use.
 - » Client requires improved suspension to manage uneven terrain around the home and in the community. (Again, of note, suspension contributes to spasticity management, tone, and positional control.)
 - » Client requires power seat functions, or a combination of power seat functions, only available on a Group 3 power wheelchair (e.g., posterior tilt, recline, power seat elevation, power elevating leg rests, anterior tilt, stand).
 - » Client requires speeds above what is available on a Group 2 power wheelchair for accessing required environments efficiently.

In this example, LUCI may very well be the accessory that allows the individual to compensate for the impairments (e.g. cognition, vision) and allow the individual to reach this required threshold of driving ability for Medicare.

Emphasize how the client's functional limitations may restrict independent mobility and meaningful participation in daily activities. Then link LUCI to addressing these limitations.

If relevant, describe how LUCI mitigates the risk of injury to the user and others in the environment, and damage to their equipment.

Functional Conclusion

After completing justification for all of the requested wheelchair components, provide a succinct conclusion to the payor as to why the client requires the recommended equipment, emphasizing the medical necessity and functional impact of the equipment being recommended. Refer to the last section in *Justifying LUCI in an LMN* below for LUCI justification guidance and examples.

Justifying LUCI

IN A LETTER OF MEDICAL NECESSITY (LMN)

LUCI may be unfamiliar to many funding sources. **To increase the likelihood of approval, provide a clear and concise description of the device that directly links its features to the power wheelchair driver's mobility-related activities of daily living (MRADLs).** When appropriate, this description should be supported by outcome measures, relevant published literature, and documentation demonstrating that less costly alternatives have been considered and ruled out. All descriptions below should be tailored to the individual client.

Description of LUCI Core Functionality

*The below is a starting point. Please customize content where relevant based on your client's lived experience. Please ensure that the information in **[BOLDED BRACKETS]** is tailored to your client.*

Based on a LUCI trial on **[DATE]** at **[LOCATION]**, LUCI will increase **[NAME]**'s functional independence and participation at home and in the community by facilitating use of the power wheelchair in all environments and/or reducing the need for supervision and caregiver assistance. Before I share how **[NAME]**'s driving and functional participation improved with the addition of LUCI, I want to explain what LUCI is and how the core functionality will be critical to **[NAME]**'s power wheelchair.

LUCI is an accessory to a power wheelchair. It mounts directly on to the **[RECOMMENDED OR EXISTING WHEELCHAIR MAKE AND MODEL]** and integrates with the wheelchair's electronics. LUCI provides advanced driver assistance through sensors that conduct a 360° scan of the chair's environment 10 times per second. The sensors can identify stationary and moving obstacles (e.g., furniture, walls, and people) and unsafe drop-offs (e.g., stairs, curbs or the edge of a ramp). The LUCI software will intervene to slow and then, when needed, stop the chair to prevent collisions and tip-overs with said obstacles and drop-offs.

LUCI's software relies on three types of sensors: radar, ultrasonics, and camera-vision with infrared, to ensure any potential obstacles **[NAME]** encounters in **[HIS/HER]** day-to-day life at home and in the community are seen. If the chair is headed towards an obstacle or unsafe drop-off, LUCI's software is customized to the driver and will intervene by scaling back the driver's input to the **[INSERT DRIVE CONTROL TYPE]** to slow the chair down allowing the user time to navigate away. This 'driver assist' functionality, which slows the chair before a collision or before driving off a curb, gives the driver sensory cues (the slowing of the chair and a light on LUCI's user interface), that call **[HIS/HER]** attention to the immediate surroundings. If **[NAME]** is unable to redirect **[HIS/HER]** driving path because of **[INSERT CLIENT DEFICIT/EXAMPLE]**, LUCI will completely stop the chair to prevent a collision or tip-over and prevent possible injury and wheelchair damage.

Because LUCI can detect moving people and obstacles around the chair, LUCI will automatically pace the speed of the power wheelchair to meet the speed of the crowd when in busy environments such as **[INSERT ACTIVITY RELEVANT TO CLIENT]**. LUCI's Crowd Confidence increases driver efficiency and reduces fatigue over a full day of chair use because the driver can move through the crowd without providing constant changes to the drive input.

To maximize your success, focus on the mobility activities that LUCI most positively impacts for your client. Tailor each example to your client's unique experience and their specific mobility needs as they relate to their MRADL's and life participation.

LUCI allows adequate clearance on all sides of the chair for easy navigation within the home and community. In standard settings LUCI stops between 2-4” away from obstacles in the front and the back, depending on the speed of approach. The front and back stopping parameters can be adjusted in the LUCI Setup Tool to accommodate stopping at a comfortable and safe distance. LUCI also has a 1” clearance on the sides of the chair to ease navigation through narrow doorways or tight areas.

Linking LUCI to Medical Necessity

It's important to communicate that LUCI is medically necessary and, therefore, not an item of convenience.

Justifying LUCI's medical necessity includes:

1. *Tying LUCI to client's MRADL's and other functional tasks;*
2. *Incorporating outcome measures where applicable, and;*
3. *Linking LUCI to peer reviewed published literature.*

1. Linking LUCI to MRADL's and other functional tasks

LUCI is a clinically essential intervention for **[CLIENT NAME]** to gain the skill of self-generated mobility, efficiency and participation in MRADL's and other functional tasks are a critical piece of the LUCI justification. Describe tasks without and with LUCI. For example:

» GROOMING AND TOILETING

Without LUCI **[CLIENT NAME]** requires **[LEVEL OF ASSIST]** to navigate the doorway to enter and navigate within the restroom. LUCI enables **[CLIENT NAME]** to navigate into the restroom **[LEVEL OF ASSIST]** and pull-up to the sink to brush **[HIS/HER]** teeth and wash hands, and up to the toilet to participate in toileting at **[APPLICABLE ENVIRONMENTS]**.

» MEAL PREPARATION

Without LUCI, **[CLIENT NAME]** has experienced multiple collisions in the kitchen when preparing meals due to **[CLIENT IMPAIRMENTS]**. With LUCI, **[CLIENT NAME]** can safely and independently approach the refrigerator to retrieve items, pull up to the counter to meal-prep, and cook meals safely and independently without any collisions.

» TRANSFERS

Without LUCI, **[CLIENT NAME]** requires **[LEVEL OF ASSIST]** to enter the bedroom and set-up for a transfer to bed. With LUCI, **[CLIENT NAME]** is **[LEVEL OF ASSIST]** when entering the room and setting up for a bed transfer.

» RAMP NAVIGATION

LUCI's drop-off protection adds critical safety when navigating ramps, especially those with open sides requiring precision. LUCI detects edges and automatically slows or stops the chair to stay centered, reducing risk of injury when negotiating ramps in and out of **[CLIENT'S APPLICABLE ENVIRONMENTS & SCENARIOS]**. Without LUCI, **[CLIENT NAME]** would rely on caregivers for safe navigation in these situations. With LUCI, **[CLIENT NAME]** is independently able to navigate ramps.

» CURBS AND DROP OFFS

LUCI detects unsafe drop-offs that **[CLIENT NAME]** cannot perceive due to **[CLIENT DEFICITS/EXAMPLES]**, preventing injury or chair damage. The system stops the chair before the edge, allowing safe redirection and independent navigation.

When appropriate, include photos and/or videos to provide a visual of how LUCI can impact a driver's navigation.

If there is no space to attach directly to the submission, you can share a link to a protected video or photo album.

For example, many ramps and curb-cuts that a wheelchair driver may regularly encounter may not be ADA compliant. If your client encounters such a curb in their regular routine, this can further emphasize how LUCI can support their safety.

- » **DRIVING IN REVERSE**
LUCI enhances independence when reversing in areas where obstacles are difficult to see due to **[CLIENT DEFICITS/EXAMPLES]**. The system automatically slows or stops the chair when an obstacle is detected, eliminating the need for caregiver assistance to navigate or communicate the environment.
- » **CROWDED ENVIRONMENTS**
In busy settings such as **[CLIENT'S APPLICABLE ENVIRONMENTS]**, **[CLIENT NAME]** experiences increased anxiety and requires caregiver support due to **[CLIENT DEFICITS/EXAMPLES]**. LUCI enables safe, independent navigation by preventing collisions and automatically adjusting speed to match surrounding movement, improving efficiency and reducing fatigue from frequent starts and stops. This conserves energy for completion of other important daily tasks and ensures the client can remain in **[HIS/HER]** chair for longer periods.

2. Outcome Measures

Including outcome measures as a part of your LUCI evaluation helps funding sources understand the medical and functional benefit of LUCI in an objective way. Modified versions of the Wheelchair Skills Test/Questionnaire (WST/WST-Q) and the Power Mobility Indoor Driving Assessment (PIDA) along with sample justification to link LUCI to improved driving skills are available at www.luci.com/funding/.

3. Published Literature

Support your specific case by linking excerpts from select peer-reviewed references to your case. A sample list of evidence is available at www.luci.com/funding/.

Description of Additional LUCI Features

This section outlines additional unique, customizable LUCI features that may be included when relevant to further bolster your client's case for how LUCI will support important mobility activities. When including these features, it is most impactful when they are tied directly to the client's functional needs.

The Dashboard: LUCI's Driver Interface

If it is important in your case to convey how the driver can control/interact with LUCI, please draw from this description of the Dashboard.

The LUCI Dashboard includes an indicator light, providing visual feedback to the driver when LUCI detects and obstacle or unsafe drop-off in the driving path. The primary function of the LUCI button on the dashboard is Override (see below) and to access settings and customization of the LUCI system. The Dashboard's auxiliary port enables LUCI button access via a switch that can be mounted anywhere on the chair to suit the driver's abilities.

Override Option

Knowing if and when LUCI can be turned off is a common question from payors. If appropriate, review and tailor the following based on the specifics of your client's case.

Should there be a scenario when the driver needs to turn LUCI off to, for example, get close enough to their bed for a transfer, push through a closed door, or **[INSERT CLIENT EXAMPLE]**, **[HE/SHE]**

REAL EXAMPLE

Simpson et al. in a publication in the Journal of Rehabilitation Research and Development state that "Independent mobility increases vocational and educational opportunities, reduces dependence on caregivers and family members, and promotes feelings of self-reliance. Reductions in functional mobility are linked with reduced participation and loss of social connections. Psychologically, decreases in mobility can lead to feelings of emotional loss, reduced self-esteem, isolation, stress, and fear of abandonment."

Not having access to self-generated mobility, which a power wheelchair equipped with a LUCI system can provide, would be detrimental to **[CLIENT NAME'S]** physical, mental, and social well-being and would result in **[HIM/HER]** being a passive participant in the world.

can temporarily disable the system's intervention by pressing the LUCI button on the Dashboard to momentarily override the system. The override function is customized to the driver OR can be disabled based on what the clinician, care team, and driver determine is best.

Customizing LUCI to the Driver

LUCI provides customizable core functions and a growing list of optional features. While funding sources may not need to learn all these details, there may be some features that exemplify how LUCI will be an essential accessory addition for your client's power wheelchair.

» REACTION TIME

LUCI captures the wheelchair driver's reaction time and adjusts the rate of its slowing accordingly. For example, when a driver has a slower reaction time LUCI will intervene and slow the chair sooner and more gradually, giving the wheelchair driver time to navigate away from the detected obstacle or drop-off. For a driver with a faster reaction time LUCI will allow the driver to get closer to an obstacle or unsafe drop-off before intervening. This keeps the world within the driver's ability to react to it.

» WHEELCHAIR PARAMETERS

For wheelchair drivers with longer footplates, larger foot boxes, or with equipment on the back of their chair, LUCI can adjust its stopping parameters in the front and the back of the chair to accommodate different virtual footprints.

» WHITE CANE FILTER

This feature was designed specifically for drivers that use a white cane to navigate the world. With White Cane Filter enabled, LUCI will ignore the repetitive swooshing motion of a white cane in front of its sensors so that LUCI can continue to drive smoothly. LUCI will still detect all other obstacles except for the driver's white cane. **[INSERT EXAMPLE SITUATIONS WHERE LUCI'S DETECTION - SIDEWALKS, DOORWAYS - WILL POSITIVELY IMPACT THE DRIVER'S MOBILITY.]**

Access to the MyLUCI App

Review the additional features offered in the MyLUCI App. If relevant to your client's successful use of LUCI, you may want to include a tailored version of those features in your LMN.

While not required for LUCI to work, the MyLUCI App opens up another world of accessible features to the LUCI user. The MyLUCI App tracks battery usage, miles driven each day, and how many collisions and tip-overs were prevented. It can enable the driver with better information in the following areas:

» SHARE DATA AND EMERGENCY NOTIFICATIONS WITH YOUR SUPPORT TEAM

By adding Support Members in the MyLUCI App, the family and care team can receive a push notification or email from the MyLUCI app if the user's heart rate spikes, if wheelchair runs out of battery, etc. For example, if the driver runs out of battery, LUCI will send the GPS location of where the incident happened to the MyLUCI care team if they have been given permission to access location data by the driver.

» LuciView™ VISUALIZER

Inside of the MyLUCI App, users can view a live feed of what the sensors are detecting in each moment. As with all other LUCI features, because this is 360-degrees, LUCI drivers can use this

The MyLUCI App is available for both Apple and Android phones and is available for download in the iOS App Store or Google Play Store.

like a backup camera, enabling them to back into bathroom stalls or elevators without worry.

» **SKIN HEALTH NOTIFICATIONS**

MyLUCI App users can setup a skin health plan with the help of their clinician inside of the app. Based on their stated plan, the MyLUCI app will send the driver push notification reminders when it is time to offload helping with greater compliance and reducing the risk of costly and painful pressure injuries.

Three Year Manufacturer Warranty

While a less common request from payors, some do ask about repairs and warranty coverage.

LUCI guarantees our system with an industry-leading manufacturer warranty of 3 years, which you can read in full at luci.com/legal/. For any questions, reach out to a LUCI expert at support@luci.com or at +1 (615) 813-5824.

Find LUCI FDA Registration Document and attach it to your submission at luci.com/funding/.

LUCI is NOT Experimental

Please include the following language and attach LUCI's FDA registration to your submission. You may also familiarize yourself with the payor's definition of experimental and state how LUCI meets that definition.

LUCI is an accessory to a power wheelchair and is an FDA Class I, exempt medical device that meets the associated requirements of the FDA and FCC. In addition, LUCI meets the applicable requirements of IEC 60601 for home use medical electrical equipment.

Ruling Out Least Costly Alternatives to LUCI

In the same way we must rule out least costly alternatives to the power wheelchair itself, we must also rule out least costly alternatives to LUCI.

- » Programming the wheelchair and drive-control to help compensate for **[CLIENT NAME]**'s multiple deficits is not sufficient to compensate for **[HIS/HER]** impairments in a way that allows independent, efficient, and safe mobility in **[HIS/HER]** power wheelchair in all environments.
- » An attendant control or a power kill switch is not appropriate alternative to self-generated mobility. These options would remove **[CLIENT NAME]**'s independence - independence **[HE/SHE]** can achieve with LUCI - and make **[HIM/HER]** dependent on a caregiver. This loss of autonomy would negatively affect **[CLIENT NAME]**'s function, mental health, social engagement, and participation in MRADLs, resulting in **[HIM/HER]** becoming a passive rather than active participant in daily life. Access to self-generated mobility is not a luxury; it is a medical necessity for independent living.
- » An obstacle-alert-only system can notify **[CLIENT NAME]** of nearby objects but cannot intervene with steering or speed and therefore cannot prevent collisions. Alerts alone are insufficient to compensate for **[CLIENT DEFICITS/EXAMPLES]**, leaving **[HIM/HER]** at risk of unintentionally striking obstacles and causing injury or damage to **[HIMSELF/HERSELF]** and to the chair and environment. In addition, current alert-only systems cannot detect changes in surface height. Without LUCI, **[CLIENT NAME]** could unknowingly drive off an unsafe drop-off, potentially tipping the wheelchair and sustaining injury.

If the client requires an attendant control and LUCI, include an explanation why. Emphasize that a full-time attendant control use is not an appropriate substitution for independent, self-generated mobility, which the client is capable of with LUCI.

Consequences if Not Approved

It is important for funding sources to understand the consequences if LUCI is not approved. Paint a picture of how the user's life may be limited if they do not receive this technology.

Should LUCI be denied:

- » **[CLIENT NAME]** would lose the ability to maximize **[HIS/HER]** abilities for self-generated mobility in all environments, which **[HE/SHE]** is capable of with LUCI, and would be dependent on a caregiver in tight spaces, busy/crowded **[INSERT ENVIRONMENTS THE USER VISITS REGULARLY]**, on ramps, outdoors on uneven surfaces and for navigating sidewalks and curb cuts.
- » **[CLIENT NAME]** faces potential injury from undetected collisions, greater risk for tip overs, and greater risk of falls from the wheelchair.
- » **[CLIENT NAME]** would experience ongoing decreased participation in MRADLs.
- » **[CLIENT NAME]** would experience increased risk of social isolation, deconditioning, and accelerated decline.
- » You, the payor, would face higher costs due to wheelchair damage and/or injury to **[CLIENT NAME]**.

Conclusion: LUCI is Essential

Close with a concise statement emphasizing the medical necessity and importance of LUCI for your client's independence, efficiency, and safety.

As you can see, the Group 3 power wheelchair with a LUCI system is required to maximize **[CLIENT NAME]**'s participation and independence. A Group 3 power wheelchair with a LUCI system is not an item of convenience as it fits the definition of durable medical equipment; is defined as equipment that can stand repeated use, is primarily and customarily used to serve a medical purpose and is generally not useful to a person in the absence of an illness or injury. The LUCI system can withstand repeated use for the 5-year life of the wheelchair. The LUCI system serves a medical purpose: It is prescribed by a physician and an **[PRESCRIBING THERAPIST'S PROFESSION]** with **[NUMBER OF YEARS OF EXPERIENCE or "MANY"]** years of experience in complex wheelchair prescription. LUCI compensates for **[CLIENT NAME]**'s deficits in the same way a head-array drive system compensates for someone's inability to drive a power wheelchair using a standard joystick control with their hands. LUCI is precisely the type of specialized, medically necessary technology that this policy and all applicable state and federal standards are designed to support. Its features are the only means to ensure the client's independence in self-generated mobility, participation, and safety in basic mobility related activities of daily living using their Group 3 power wheelchair. Denial would contradict the spirit and the explicit language of coverage philosophy guiding your plan, especially when all alternatives have been exhausted and functional need is clear. **In closing, making people with disabilities more dependent on others when medical device interventions, such as the LUCI system, exist to allow them to be more independent is inappropriate and inconsistent with federal law and all existing standards of practice in the field of rehabilitation.**

As with any aspects of LUCI, we're here to help! We can provide feedback of justification documentation as it relates to LUCI prior to submission. Or if you have any other questions, reach out the clinical education team!

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