

## Therapeutic Shoes for Persons with Diabetes

### NURSE PRACTITIONERS (NPs) OR PHYSICIAN ASSISTANTS (PAs) PROVIDING ANCILLARY SERVICES AS AUXILIARY PERSONNEL “INCIDENT TO” REQUIREMENTS:

SUPERVISING PHYSICIAN, DOCTOR OF MEDICINE (MD) OR DOCTOR OF OSTEOPATHY (DO) (1)

**Supervising physician documents in the medical record the patient is:**

- Diabetic, has been and continues to provide, the patient follow-up under a comprehensive management program of that condition; **and**

NP OR PA (2)

**NP or PA certifies:**

- Provision of the therapeutic shoes is part of the comprehensive treatment plan being provided to the patient; **and**

SUPERVISING PHYSICIAN, MD OR DO (3)

**Supervising physician must:**

- Review and verify (sign and date) all NP or PA notes in the medical record pertaining to the provision of the therapeutic shoes and inserts, acknowledge agreement with the action of the NP or PA.
- The supervising MD or DO is billing for the service under the MD or DO NPI.

*Practicing “incident to” supervising physician MD or DO*

*This clarification is specific to NPs and PAs who are practicing under the supervision of an MD or DO (i.e., “incident to” and does not extend to NPs who practice independently (i.e., bill under their own NPI).*

## RESOURCES

**Joint DME MAC Article:** “Nurse Practitioners and Physician Assistants as Certifying Physicians for Therapeutic Shoes and Inserts”

- JB: <https://www.cgsmedicare.com/jb/pubs/news/2020/11/cope19409.html>
- JC: <https://www.cgsmedicare.com/jc/pubs/news/2020/11/cope19409.html>