

ADVISORY GROUP MEETING MINUTES

Meeting date and time:

August 27, 2020, 1:00 p.m. – 2:15 p.m. ET

Facilitator: Judie Roan, JC POE Senior Analyst**Additional CGS Staff:** Tracy Sessoms**Advisory Group Members:** Joyce Ardrey, Jane Talley, Lisa Wells, Tom Martin, Maggie Kling, Kimberly Hanson, Jim Del Bianco, Trudy Obenhofer, Aaron Sorenson

- Correct coding for Scoliosis braces;
- COVID-19 resources;
- Medical Review Post-Pay review for HCPCS L0850; and
- The new Spinal Orthoses and Replacement Orthosis During the Reasonable Useful Lifetime checklists.

A member stated they like the prior authorization option, the only concern expressed was obtaining documentation from the physician.

AGENDA

- I. Roll Call & Purpose
- II. Updates and Changes
- III. Suggestions – Last Meeting
- IV. Educational Feedback and Online Tools
- V. Online Tool Spotlight
- VI. Feedback on Education and Online Tools
- VII. Upcoming Events & 2020 Educational Planning
- VIII. Feedback and Suggestions
- IX. Open Discussion

I. ROLL CALL & PURPOSE

Judie welcomed the group, conducted roll call, introduced a new member, then reviewed the purpose of the Advisory Group:

- The primary function of the Orthotics and Prosthetics POE Advisory Group is to assist CGS in the creation, implementation, and review of provider education strategies and efforts.
- The Advisory Group provides input and feedback on training topics, educational materials, and dates and locations of provider education workshops and events.
- The group also identifies relevant provider educational issues and provides recommendations of how to effectively distribute the information to all appropriate suppliers and their staff.

II. UPDATES AND CHANGES

Judie reviewed the condition of payment prior authorization (PA) for lower limb prosthetics including the dates, affected codes, submission process, new tools, and the new webpage located at: https://www.cgsmedicare.com/jc/mr/llp_prior_auth.html.

She then provided information regarding:

- The revised ABN required for use on and after January 1, 2021;
- Correct coding and coding verification review requirement for prosthetic feet and additions to lower limb extremity prostheses;

There were a few questions:

Question: If an item is prior authorized is it possible it would be denied in an audit?

Answer: If the documentation substantiates the need for an affirmed prior authorization, and the same documentation is submitted to the auditing contractor with the addition of a valid proof of delivery; ideally there should be no reason for a denial.

Question: A member stated she attended the Noridian Lower Limb Prostheses Prior Authorization webinar and would like to confirm consistency with the CGS and Noridian process; advised she will send an email to Judie to address any issues.

Answer: Once she receives the email that she will work with Noridian to research.

Question: If once the coding verification for the affected codes is implemented, will they have to submit a copy of the letter from the PDAC?

Answer: As of today there is no requirement to send the PDAC coding verification letter with the prior authorization request.

Question: If they are submitting a request with two of the affected codes (foot and knee) on the same prosthetic, are two separate prior authorization request forms and duplicate documentation required to be submitted?

Answer: No. When both LLP HCPCS codes are subject to PA, they can be submitted on the same request form. However, two UTNs and response letters will be provided by CGS, one for each of the required PA HCPCS codes; when the claim is submitted, both UTNs must be included. When the claim is submitted electronically, each UTN must be entered on the 2400-Service Line for the applicable HCPCS code.

Question: What documentation should be submitted with the PA request?

Answer: All documentation should be submitted including: The Standard Written Order (SWO), documentation from the medical record from the ordering practitioner, and prosthetist's documentation. Judie suggested utilizing the documentation checklist located at: https://www.cgsmedicare.com/pdf/dme-checklists/llp_2018re.pdf.

Question: A member mentioned that they are delighted that the new checklists have been created; particularly the replacement orthotics checklist.

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Answer: There is also an article that will be available in the near future.

Addendum: Now available at: <https://www.cgsmedicare.com/jc/pubs/news/2020/08/cope18619.html>

There was additional discussion regarding same and similar orthoses. A member offered to send an email with some suggestions for addressing same and similar denials.

III. SUGGESTIONS – LAST MEETING

Judie provided an update on the suggestions from the last meeting:

Suggestion: Create a same and similar chart to assist with locating similar items through myCGS.

Response: The new Same/Similar tool is located at: https://www.cgsmedicare.com/medicare_dynamic/jc/samesimilar/samesimilar.aspx

Suggestion: Improve the annual myCGS renewal process.

Response: This is currently being researched and we are identifying opportunities for improvement.

Suggestion: Host a website navigation webinar.

Response: This is currently in process.

IV. EDUCATIONAL FEEDBACK

Judie then asked if anyone attend webinars, workshops, association meetings, councils, or the Ask the Contractor Teleconference (ACT)?

- A few members stated they had attended webinars and ACT calls; one stated that the ACT calls are always great; another member stated she attended numerous webinars and they were all very, very good.
- A member stated that they are very appreciative that CGS has implemented suggestions and that they listen and implement our suggestions.
 - Judie reiterated that supplier feedback is very important to CGS.

Judie reviewed the new online tools including the Therapeutic Shoes for Persons with Diabetes Activity Timeline. She then asked if there was any other feedback on our online tools. A few members stated that their staff utilize myCGS on a daily basis and it is very, very helpful.

V. ONLINE TOOL SPOTLIGHT

The Same/Similar Tool is in the spotlight this quarter. Judie reviewed the benefits of this tool and how it can assist O&P suppliers in confirming which codes are considered same/similar. It is important to note that lower limb prosthetic codes are not included in the tool.

A member asked, if the description of the HCPCS tool doesn't include a Reasonable Useful Lifetime is the RUL 5 years? Judie stated that the majority of orthoses codes have a 5-year RUL; if there is a different RUL it will be listed in the policy article. Members stated how excited they are that this tool is now available.

VI. UPCOMING EVENTS & 2020 EDUCATIONAL PLANNING

Judie provided members with the upcoming webinar schedule for September through November.

VII. FEEDBACK AND SUGGESTIONS

Judie then asked the group if they have any feedback or suggestions regarding anything we have discussed or any other topics.

She then reviewed the suggestions received from the meeting today, including a suggestion that the emails of all of the members be shared with the group. Judie stated she will take that back and, if so, she will send a survey to the members to confirm all members approve the release of their information.

There was then discussion regarding the Standard Written Order.

VIII. OPEN DISCUSSION

Judie then reminded members, if they have any additional suggestions or feedback, don't hesitate to send her an email; she then thanked the members for a very beneficial meeting.

A member asked if there has been any update with the Jurisdiction B and/or C contract procurement. Judie stated she would research and confirm what can be released.

Addendum: CMS has posted information regarding the JC contract award located at: <https://www.cms.gov/Medicare/Medicare-Contracting/Medicare-Administrative-Contractors/Whats-New->

A member stated that it has been great working with CGS and CGS has been very proactive and reactive in providing information to the supplier community, and they would really like to provide any support necessary to assist.

Tracy Sessoms with CGS wanted to thank everyone for their support and feedback. She also reminded the group of the survey available on myCGS and the CGS website.

There was additional discussion on providing information to redeterminations when the claim has denied as same/similar:

- Judie referred to the new documentation checklist, as well as, a joint DME MAC article regarding same or similar and the appeals process, now available at: <https://www.cgsmedicare.com/jc/pubs/news/2020/08/cope18619.html>
- She stressed the importance of confirming that the submitted documentation substantiates the change in condition, that the coverage criteria for the new item are met, and that it must contain documentation as to why the previous orthosis is not suitable for the current condition.

Judie then thanked the members for their attendance and participation.