

ADVISORY GROUP MEETING MINUTES

Meeting date and time: October 21, 2021 1:00 - 1:45 p.m. ET

Facilitator: Judie Roan, JC POE Senior Analyst

Additional CGS Staff: Rachel Sinclair

Advisory Group Members: Aaron Sorenson, Curt Bertram, Danielle Sparks, Jane Talley, Joyce Ardrey, Maggie Kling, Stephanie Green

Agenda

- I. Roll Call, New JB Members, & Purpose
- II. Updates & Changes
- III. Suggestions – Last Meeting
- IV. Educational Feedback
- V. Online Tools & Spotlight
- VI. Upcoming Events & 2021-2022 Educational Planning
- VII. Feedback & Suggestions
- VIII. Open Discussion

I. Roll Call & Purpose

Judie welcomed the group, introduced new members, and then reviewed the purpose of the advisory group:

- The primary function of the Orthotics and Prosthetics (O&P) Provider Outreach and Education (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 & Changes

Judie provided information regarding the quarterly required completion of the survey, thanked members who completed the survey last quarter, and stated she would send an email with the survey link to the members.

She then provided information on CR 12282 - **Additional Payment Edits for DMEPOS Suppliers of Custom Fabricated and Prefabricated (Custom Fitted) Orthotics** which was effective for dates of service on or after October 1, 2021.

- When a supplier is located in one of the applicable states and wishes to bill Medicare for prosthetics and custom fabricated orthotics listed in Change Request 12282, they must be properly enrolled with the National Supplier Clearinghouse (NSC).

- Alabama, Arkansas, Florida, Georgia, Illinois, Iowa, Kentucky, Mississippi, New Jersey, North Dakota, Ohio, Oklahoma, Pennsylvania, Rhode Island, Tennessee, Texas, and Washington.

- <https://www.cms.gov/Regulations-and-Guidance/Guidance/Transmittals/Transmittals/r11002otn>

III. Suggestions – Last Meeting

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

Suggestion: Improve the annual myCGS renewal process.

Response: Improvements to the renewal process are scheduled to be implemented in 2021.

Suggestion: In myCGS, can the physician who ordered the item, or the diagnosis code, be added to items to assist with same and similar?

Response: This question is currently being researched and is being prioritized.

Suggestion: Host a website navigation webinar.

Response: There is a general CGS website tutorial located at: https://www.cgsmedicare.com/videos/web_tutorial.html, and a DME MAC specific webinar/tutorial is in process.

Suggestion: Add pre-claim review for custom fitted and custom fabricated orthotics.

Response: This suggestion has been shared with the MR management team and is currently being researched. Judie referred the members to the master list of items that maybe subject to prior authorization in the future (<https://www.cms.gov/Research-Statistics-Data-and-Systems/Monitoring-Programs/Medicare-FFS-Compliance-Programs/DMEPOS/Downloads/FINAL-RULE-MASTER-LIST-of-DMEPOS-Subject-to-Frequent-Unnecessary-Utilization-2018-03-30.pdf>).

Suggestion: Create different groups of orthoses. For example: A complex custom fit orthosis won't be denied for same or similar with a more basic item, such as a walking boot.

Response: Currently, due to benefit integrity issues and to protect the Medicare trust fund, these claims will continue to be denied as same/similar, and documentation to substantiate the change in need must be submitted to redeterminations.

A member stated they don't understand why custom knee-ankle-foot orthoses (KAFOs) are considered same/similar as ankle-foot orthoses (AFOs), as they have different coverage criteria. Judie stated she would provide this feedback to the medical directors.

IV. Educational Feedback & Online Tools

Judie asked if anyone attended webinars, workshops, association meetings, councils, or the Ask-the-Contractor Teleconferences (ACTs).

- Members stated that that numerous staff have attended webinars.

Judie then asked if the members used any online tools.

- Numerous members stated they used myCGS, and they use Durable Medical Equipment Coding System (DMECS) on a regular basis. One member stated that they had been utilizing the documentation checklists to educate physicians, and it has been very beneficial, and some physicians are going to include the information in their medical records to confirm that all of the Medicare requirements are addressed. One member stated they are utilizing the YouTube videos as well.

V. Online Tool Spotlight

Judie reviewed the Same/Similar tool in the spotlight:

- Same/Similar Tool
 - JB: https://www.cgsmedicare.com/medicare_dynamic/jb/samesimilar/samesimilar.aspx
 - JC: https://www.cgsmedicare.com/medicare_dynamic/jc/samesimilar/samesimilar.aspx

She then reviewed additional same/similar resources including the following article and checklist:

- Same or Similar Denials for Orthoses and the Appeals Process
 - JB: <https://www.cgsmedicare.com/jb/pubs/news/2020/08/cope18619.html>
 - JC: <https://www.cgsmedicare.com/jc/pubs/news/2020/08/cope18619.html>
- Replacement Orthotics for Change in Condition During the Reasonable Useful Lifetime
 - JB & JC: https://www.cgsmedicare.com/pdf/dme_checklists/replacement_orthotics_rul.pdf

A member asked about the benefits of using the same/similar tool, and Judie explained that many suppliers are not familiar with the Medicare same/similar guidelines, and the tool provides a list of items that are considered same/similar. Some suppliers find the tool very helpful.

Judie also provided information on additional online resources, including the Online Education Portal and Encore webinars.

VI. Upcoming Events & JC 2021 Educational Planning

Judie provided members with the upcoming webinar schedule through December. She then reviewed the educational plan for 2021, including O&P webinars and the upcoming ACT call. She asked for feedback regarding the future plan.

- A member asked, "What is an ACT call, and what are the benefits?"
 - Judie responded that the CGS ACT calls are usually general and provide the opportunity for suppliers to ask questions to the DME MAC. The CGS ACT calls usually address hot topics or changes to the Medicare program. For example, CGS held an ACT call specific to prior authorization during the implementation process.

- A member then asked is the ACT call the best way to ask any general questions. Judie stated that members can always attend the ACT and ask questions, but another available resources is the Community Coach Program. She explained that each state has a community coach, and if you have questions, you can always contact your community coach.

- JB: <https://www.cgsmedicare.com/jb/education/ccp.html>

- JC: <https://www.cgsmedicare.com/jc/education/ccp.html>

Customer support is also available to address any questions.

Judie then asked if there is any education that would be beneficial to include in 2022 education.

VII. Feedback & Suggestions

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

- A member asked if there has been any consideration of suppliers affected by supply chain issues.
 - Judie stated the DME MAC can apply some flexibilities to items that have requirements to be delivered within a specific timeframe due to supply chain or back order issues. She mentioned that there should be documentation in the beneficiary's records to substantiate any backorder or supply chain issues.
- A member then stated that the cost of many items has increased significantly, and asked if there has been any consideration of increasing the fee schedules.
 - Judie stated that the fee schedules are defined by CMS and that she will take this information back for discussion.
- A member asked if CGS hosts any upper limb webinars.
 - Judie stated that since there is no NCD, LCD, or PA, CGS does not host upper limb-specific webinars. However, the general orthoses or prostheses criterion must be met in addition to the standard documentation requirements (standard written order (SWO), proof of delivery, etc.). Therefore, Judie suggested attending the Documentation Requirements webinar series.
- A member then asked about the AFO/KAFO LCD and the ambulatory requirement: what if the beneficiary has the potential to be ambulatory with the assistance of the AFO/KAFO?
 - Judie stated that potential functional ability is not addressed in this LCD/PA. The beneficiary must meet the ambulatory criteria for the date of service. Judie then stated that the items can be individually considered for each beneficiary with documentation to substantiate the clinical need. She then stated that an advance beneficiary notice (ABN) can be obtained, and the appeals process can be followed. Judie also provided an additional option to submit an LCD reconsideration request and include any clinical evidence and benefits.

VIII. Open Discussion

Judie asked if there was anything for open discussion.

The meeting was adjourned.