

**In Case you Missed It:****TWICE-MONTHLY RECAP**

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October 13, 2017

**AOPA and APMA Send Letter to CMS Administrator Regarding A5513 Coding**

Letter Suggests Less Restrictive Interpretation or Updated Verbiage

On September 29, AOPA and the American Podiatric Medical Association (APMA) sent a joint letter to CMS Administrator Seema Verma expressing their concern about the recent DME MAC coding clarification for HCPCS code A5513. The coding clarification essentially states that in order to bill Medicare for a custom fabricated diabetic insert using HCPCS code A5513, a physical model of the patient's foot must be created and that the insert must then be molded over the physical model of the foot. The clarification further states that processes that use a "virtual" model to create a custom fabricated diabetic insert through direct milling or another manufacturing process do not meet the code language for A5513 and therefore must be billed using A9270 which is a HCPCS code used to describe statutorily non-covered services. The AOPA/APMA letter expresses the concern that the overly strict interpretation of the descriptor language for A5513 limits the use of advanced technologies such as direct milling and 3-D printing to produce diabetic inserts that may result in a more intimate fit for the patient, possibly leading to better outcomes. The joint letter suggests that CMS can solve the issue by either instructing the DME MACs and PDAC to be less restrictive in their interpretation of the code language for A5513 or by asking the CMS HCPCS panel to consider a verbiage change that would allow providers to bill custom diabetic inserts as A5513 without the requirement that the inserts be molded to a physical model of the patient's foot. [Read the letter to CMS.](#)

**CMS Withdraws BIPA 427 Proposed Rule**

Disappointing News to O&amp;P

On October 3, CMS announced that it has withdrawn the proposed rule that represented the first step in creating regulations that would implement the qualified provider provisions for prostheses and custom fabricated orthoses legislated in section 427 of the Benefits Improvement and Protection Act of 2000 (BIPA). According to the notice from CMS, the proposed rule is being withdrawn due to "the cost and time burdens that the proposed rule would create for many providers and suppliers, particularly the cost and burden for those providers and suppliers that are small businesses, and the complexity of the issues raised in the detailed public comments." While the proposed rule was far from perfect, AOPA believed that issues that were of significant concern to several provider groups could have been addressed through changes to the final rule. The combination of the recent administration change, including the new administration's philosophy to reduce overall regulatory burden on businesses, the significant opposition from several high profile provider groups, and the restrictive language that would significantly limit certain providers from continuing to provide custom orthoses and prostheses appear to have led directly to the withdrawal of the proposed rule. AOPA will continue to make every effort to ensure that all recipients of O&P care receive that care from folks who have been properly educated and trained in the fabrication, fit, and delivery of orthotic and prosthetic devices.

**Join AOPA for Compliance & Ethics Week - November 5-11**

Many free resources to help you celebrate

Mark November 5-11 on your calendar for Healthcare Compliance & Ethics Week! AOPA is celebrating and providing resources for members, many of them at no cost, to facilitate participation during the week and leading up to it. We will be sending out daily compliance tips and the chance to win prizes during HCEW week, and providing special educational opportunities. We've made it easy to participate with White Papers, Samples and low or no cost education. [Access here.](#)



## Promote your Brand with AOPA's new Apparel Program

Polos, Scrubs, and Lab Coats

AOPA is partnering with Encompass Group, a leading provider of health care apparel to offer members special prices on customized polos, scrub tops and lab coats. Customized embroidery is available. For more information on products and available colors, go to [www.iconscrubs.com](http://www.iconscrubs.com). Enter access code: ICON-AOPA. Then enter your AOPA member id, and create your user profile. Contact [bleppin@AOPAnet.org](mailto:bleppin@AOPAnet.org) for additional information.



## Last Coding & Billing Seminar of 2017

November 6-7 in Phoenix

AOPA experts provide the most up-to-date information to help O&P Practitioners and office billing staff learn how to code complex devices, including repairs and adjustments, through interactive discussions with AOPA experts, your colleagues, and much more. Meant for both practitioners and office staff, this advanced two-day event will feature breakout sessions for these two groups, to ensure concentration on material appropriate to each group. Book your hotel room before October 13 for AOPA's rate of \$179 per night. [Register now.](#)



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