



American Orthotic & Prosthetic Association

www.AOPAnet.org

AOPA In Advance SmartBrief
Breaking News
November 1, 2018

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Qualified Independent Contractor (QIC) Formal Telephone Discussion Demonstration Has Been Expanded to Jurisdictions A & B

On January 01, 2016, CMS launched the QIC Telephone Discussion Demonstration project to determine if engagement between suppliers and the QIC could improve the understanding of the cause of appeal denials, and lead to increased proper claim submissions. The project was originally only limited to certain DME claims, however in October 2016, the project was expanded to include all DME claim types, including orthotics and prosthetics, but only in Jurisdictions C and D.

CMS has recently announced that the Formal Telephone Discussion Demonstration has been expanded to include Jurisdictions A & B starting on November 1, 2018.

Participation in the telephone discussion demonstration is voluntary, but unfortunately there is no way to “sign up” for this program. Your claim(s) must be selected for review by representatives of

the QIC, currently that contractor is C2C solutions. C2C Solutions reviews reconsideration requests to identify appeals that may benefit from participation in the telephone discussion process. Eligible suppliers are then offered the opportunity to engage in a telephone discussion with QIC prior to the issuance of the reconsideration decision.

This extra step allows suppliers to discuss the facts of the appeal directly with C2C medical review staff and to submit any missing documentation that may have been identified by C2C. Early results of the initial phases of the demonstration project proved to be very successful with a denial overturn rate approaching 86%.

Questions? Contact Joe McTernan at jmcternan@AOPAnet.org or Devon Bernard at dbernard@AOPAnet.org.

SPS Offers Two \$2,500 O&P Student Scholarships in 2019



SPS, the leading U.S. distributor of orthotic & prosthetic products, is pleased to announce its annual student scholarship opportunity that will be awarded to two, full-time O&P Master's students. The \$2,500 scholarships will be presented to deserving students based on academic achievement, leadership qualities, and essays. To be considered, students are to apply directly to SPS no later than February 15, 2019. Visit www.spsco.com/scholarship for details on qualifications and how to apply.

ABC Updates Therapeutic Shoe Fitter Exam



The American Board for Certification in Orthotics, Prosthetics and Pedorthics, Inc. (ABC) recently held a standard setting meeting of ABC certified therapeutic shoe fitters (CFts) to establish the minimum score to pass the therapeutic shoe fitter certification exam. Participation by the certified therapeutic shoe fitters was critical to accomplishing this work.

Earlier this year ABC's Pedorthic Exam Committee, which is responsible for oversight of the CFts certification exam, approved a new form of the CFts exam. The new form was constructed from existing exam questions and new questions created through an item writing campaign, also completed earlier this year. This critical work assures that the CFts exam is a contemporary assessment of the profession.

"These efforts from dedicated ABC volunteers allow us to build a relevant and contemporary therapeutic shoe fitter exam. A relevant and updated certification exam will ultimately protect those individuals with diabetes who need these important services," stated Deborah Merritt Plescia, CPO, ABC President. The new CFts certification exam will be administered for the first time in February 2019.

AOPA 2019 National Assembly Call for Papers

The AOPA National Assembly Clinical Sessions Workgroup has issued a call for papers for the 102nd Annual AOPA National Assembly to be held September 25-28, 2019 in San Diego, California. The submission deadline is March 25, 2019. Share your expertise and advance your career by being part of the country's longest serving and largest meeting for the orthotic, prosthetic and pedorthic profession.

- Papers are being accepted for podium, poster and/or symposium sessions for each of the five concurrent education tracks (orthotic, prosthetic, pedorthic, technician, and business). For more information or to submit a paper go to our dedicated web page <http://www.aopanet.org/education/2019-aopa-national-assembly/call-for-papers/>
- All submission must be submitted electronically.
- Before submitting a paper, please review the model abstract which also provides additional information about the submission process. The model abstract is available at <http://www.aopanet.org/wp-content/uploads/2018/10/National-Assembly-Abstract-Template-Model-1.pdf>

For general information about the Assembly

Visit: <http://www.aopanet.org/education/2019-aopa-national-assembly/>

Email: Assembly@AOPAnet.org or call Ryan Gleeson at (571) 431-0836.



CMS Introduces New Documentation Look-Up Service Initiative

The Centers for Medicare and Medicaid Services held a special Open-Door Forum conference call on Tuesday, October 23, 2018, to educate the public about a new initiative tasked with developing an online resource where providers and suppliers can look up the documentation requirements necessary for Medicare to cover a service or item.

The goals of the Documentation Requirement Lookup Service prototype are to reduce provider burden, reduce improper payments and appeals, and improve "provider to payer" information exchange. CMS is currently recruiting providers and suppliers to pilot the prototype system. The initial pilot project will be populated with the following information:

1. If Medicare FFS requires prior authorization for a given item or service; and
2. Documentation requirements for Oxygen and Continuous Positive Airway Pressure Devices.

The slide presentation from the conference call can be [accessed here](#).

Additional information about the Documentation Requirement Lookup Service Initiative can be [found here](#).

University of Pittsburgh Seeking Participants for Survey

The Human Engineering Research Lab at the [University of Pittsburgh is conducting a survey](#) to gather input [on research and development](#) directions from assistive technology clinicians and professionals. We hope that you will take a few moments to share your knowledge by completing the survey at: <https://is.gd/providerawareness>.

DME MACs Release Revised "Dear Physician" Letter Regarding General Documentation Requirements

The four Durable Medical Equipment Medicare Administrative Contractors (DME MACs) have recently released a revised version of the "Dear Physician" letter that addresses the need for prescribing physicians to support the medical necessity of the DMEPOS services they prescribe through proper clinical documentation in the patient's medical record. While the revisions to the

Dear Physician letter were not significant from previous versions of the long-standing letter, the revision provides a reminder that for DMEPOS items or services to be covered, they must **always** be supported by physician documentation.

O&P won a battle in February 2018, with the enactment of Section 50402, which recognized the clinical notes of orthotists and prosthetists as part of the medical record for purposes of medical necessity determinations. While the legislative change essentially reset the clock back to 2011 and reversed the now retired Dear Physician letter for lower limb prostheses that said that O&P notes were not considered part of the medical record, Section 50402 **DID NOT** convey to O&P prescribing rights and **DID NOT** eliminate the need for physician notes supporting the medical need for O&P services they prescribe. Section 50402 specifically indicates that while orthotist and prosthetist notes are now part of the medical record, they are corroborative, and cannot, standing alone, trigger a finding of medical necessity.

The recognition of orthotist and prosthetist notes as part of the medical record is a long sought-after result, and one of great pride for AOPA but it is important to remember the crucial role of physician partners in documenting the medical need for O&P services they prescribe.

The revised Dear Physician letter regarding general documentation was just one of many minor revisions made to the Dear Physician letters. Most of the revised Dear Physician letters do not apply to O&P services. This includes the recently revised Dear Physician letter regarding face-to-face visit and written orders prior to delivery for certain DMEPOS items. It is important to remember that these specific requirements do not apply to O&P services as O&P services are specifically exempt from these requirements.

AOPA continually monitors the DME MAC websites for substantive changes to the Dear Physician letters that affect O&P providers and will communicate them to AOPA members immediately.

The revised Dear Physician letter on general documentation requirements may be viewed by clicking [HERE](#).

Questions regarding this issue may be directed to Joe McTernan at jmcternan@aopanet.org or Devon Bernard at dbernard@aopanet.org

<p style="text-align: center;">AOPA Board Addresses and Provides Guidance on Issues of Non-Discrimination and Anti-Harassment in the Workplace</p>

At its most recent meeting on September 24 at the AOPA National Assembly in Vancouver, the AOPA Board unanimously adopted the following statement, and determined to both include this in *AOPA Code of Interactions with Health Care Professionals*, and to recommend it to all AOPA Members (educational programming in support of this statement is being considered):

Nondiscrimination/Anti-Harassment in the Workplace

AOPA member companies, as assembled groups of healthcare professionals, must operate in full compliance with all federal and state laws, including those that govern discriminatory practices. Title VII of the Civil Rights Act of 1964 prohibits employers from discriminating against employees on the basis of sex, race, color, national origin, and religion. By way of accreditation, it is established that O&P facility owners operate with compliance plans that adhere to these tenets and condemn any form of discriminatory practices in the workplace. *Every employee is entitled to*

fair treatment in the workplace. Any violation of these conditions is not consistent with the standing of AOPA member companies as assembled groups of healthcare professionals and is not consistent with this Code. More importantly, any violation of these conditions is almost certainly illegal, and punishable under state or federal laws.

AOPA also provided input on this issue to the O&P Alliance at its meeting in Vancouver which resulted in establishment of an Alliance Work Group on this item. AOPA has since submitted suggested language for an open letter from the O&P Alliance.

Mark your Calendars for Healthcare Compliance & Ethic Week – Nov. 4-10

How is AOPA celebrating Healthcare Compliance & Ethics Week?

Next week AOPA and our members are celebrating the first annual Healthcare Compliance & Ethics Week, with daily activities. Every day AOPA will send out a Compliance Tip and question of the day. Answer each day's Compliance question for a chance to win one of 3 daily prizes:

- \$100 Visa card
- [AOPA Compliance Guide](#)
- [Office fun pack](#) (4 HCEW mugs, 4 HCEW pens, and 4 HCEW charger sets)

Follow us on [Facebook](#) and [Twitter](#) for daily updates. Other special events during the Week:

November 5	1:00 PM EST Webinar -FREE for AOPA members Creating a Compliant Office: Healthcare Compliance & Ethics Week
November 6	1:00 PM EST Webinar -FREE for AOPA members Texting and E-mail with Patients: Patient Requests and Complying with HIPAA: Healthcare Compliance & Ethics Week
November 7	1:00 PM EST Webinar -FREE for AOPA members Defining, Mitigating and Reducing Harassment in the Workplace: Healthcare Compliance & Ethics Week
November 8	1:00 PM EST Webinar -FREE for AOPA members Top Ten Things You Need to Know to Create a Chart Audit
November 9	1:00 PM EST Webinar -FREE for AOPA members Panel Discussion on Cyber Security

AOPA Submits Comments on Draft Lower Limb Prosthesis Policy Released by Blue Cross Blue Shield of IL, TX, MT, NM, and OK

On October 1, 2018, AOPA submitted comments on a draft policy governing coverage of lower limb prostheses, including microprocessor-controlled prostheses issued by Health Care Services Corporation (HCSC), which operates Blue Cross Blue Shield of Illinois, Texas, Montana, New Mexico, and Oklahoma. The draft policy, as written will significantly reduce access to advanced prosthetic technology for BCBS subscribers in these five states. AOPA expressed its concern regarding the draft policy in its comments which are summarized below and linked at the end of this article.

AOPA's first concern is that HCSC published the draft policy on September 15, 2018 with comments due no later than October 1, 2018. AOPA commented that 15 days was not sufficient time to perform a complete review of the draft policy and provide informed comments. AOPA suggested a minimum 60-day comment period to allow stakeholders adequate time to comment on the draft policy. Despite the unrealistic deadline, AOPA submitted comprehensive comments regarding the draft policy and negative impact it will have on BCBS subscribers.

AOPA commented that the draft policy is unnecessarily restrictive and will limit access to advanced technology, especially to BCBS subscribers who may be classified as limited community ambulators (K2) but may benefit more from receiving microprocessor-controlled prosthetic knees. AOPA referenced studies published by the RAND Corporation, the health economics firm Dobson-DaVanzo, and the Mayo Clinic that showed that the use of microprocessor-controlled knees by limited community ambulators reduced the rate of falls and fall related injuries. The draft policy would effectively eliminate BCBS coverage except for patients who were assessed as high functioning community ambulators (top percentage of K3 patients).

AOPA's comments also referenced the recent report of the inter-agency workgroup that was convened to provide a consensus statement on Medicare coverage of lower limb prostheses after the Medicare draft LCD was released several years ago. The inter-agency workgroup recommended the potential creation of a National Coverage Determination that would address Medicare coverage of microprocessor knee in K2 patients. AOPA's comments expressed concern that restricting access to advanced prosthetic technology was not in BCBS' best interest nor the best interest of their subscribers as it was contradictory to the consensus statement of the inter-agency workgroup and the overall health of their subscribers.

AOPA is hopeful that HCSC will seriously consider AOPA's comments before publishing the final version of the policy revision.

[AOPA's complete comments may be viewed here.](#)

2019 AOPA Webinars Announced

AOPA is pleased to announce the topics for its 2019 Webinars, which take place on the second Wednesday of each month at 1:00 P.M. Eastern Time. [Register here.](#)

January 9: Understanding the Knee Orthoses Policy

February 13: Patient Outcomes: Best Practices & How to Use Them

March 13: Advanced Beneficiary Notice: Get to Know the ABN Form

April 10: Shoes, External Breast Prostheses, Surgical Dressings and Other Policies

May 8: Are You Compliant-Know the Supplier Standards

June 12: Documentation-Understanding Your Role

July 10: T.P.E – Get to Know the Program & What the Results are Telling You

August 14: Are You Ready for the Worst: Contingency Planning

September 11: Veteran Affairs Updates: Contracting, Special Reports and Other News

October 9: Performance Reviews: How is Your Staff Doing?

November 13: The Holiday Season-How to Provide Compliant Gifts

December 11: New Codes for 2020, Other Updates and Yearly Round-Up

During these one-hour sessions, AOPA experts provide the most up-to-date information on a specific topic. Perfect for the entire staff-- a great team-building, money-saving, educational experience!

Sign up for the entire series and get two conferences FREE. Entire Series (\$990 Members/\$1,990 Non-Members). [Register here](#).

Upcoming AOPA Events	
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November 4-10, 2018	<i>AOPA Healthcare Compliance & Ethic's Week</i> AOPA Sponsored Events Learn more here
November 12-13	Mastering Medicare: Advanced Coding and Billing Techniques The Tropicana Resort, Las Vegas, Nevada Learn more here
November 14, 2018	<i>Evaluating Your Compliance Plan & Procedures: How to Audit Your Practice</i> AOPA Webinar Learn more and register here
December 12, 2018	<i>New Codes, Medicare Changes & Updates</i> AOPA Webinar Learn more and register here
January 4-6, 2019	AOPA Leadership Conference Scottsdale, Arizona Learn more here