



American Orthotic & Prosthetic Association

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AOPA In Advance SmartBrief
Breaking News
March 12, 2019

AOPA Headlines:

[CMS Announces Product Categories and Timeline for Competitive Bidding 2021](#)

[Jurisdiction D Releases Quarterly TPE Results](#)

[Medicare Announces Two New Proposed RAC Audits for O&P](#)

[Policy Forum Registration is Now Open for May 7-8!](#)

[Take Advantage of AOPA's Career Center](#)

[Revision to the LSO/TLSO Policy Article](#)

[New Legislative Focus in 2019](#)

[Thank you to our 2019 Supplier Plus Members](#)

[Join the Coding & Billing Experts in Indianapolis](#)

[Performant Announces New RAC Audit](#)

[CMS Releases the 2019 Medicare DMEPOS Fee Schedule](#)

[Updated Requirements for the RT and LT Modifiers](#)

[HCPCS Code Changes for 2019](#)

[Upcoming Events](#)

CMS Announces Product Categories and Timeline for Competitive Bidding 2021

On March 7, 2019, The Centers for Medicare and Medicaid Services (CMS) announced the final product categories and timeline for the Medicare DMEPOS Competitive Bidding Program that will begin for dates of service on or after January 1, 2021.

As expected, certain off-the-shelf (OTS) knee orthoses and spinal orthoses will be included in the 2021 competitive bidding program. A total of 16 OTS spinal orthosis codes and 7 OTS knee orthosis codes will be included in the program. The specific codes that have been identified by CMS are listed below.

OTS Spinal Orthosis Codes Included in Competitive Bidding 2021

L0450, L0455, L0457, L0467, L0469, L0621, L0623, L0625, L0628, L0641, L0642, L0643, L0648, L0649, L0650, L0651

OTS Knee Orthosis Codes Included in Competitive Bidding 2021

L1812, L1830, L1833, L1836, L1850, L1851, L1852

One knee orthosis code (L1848) has been removed from the list as it represents an orthosis that policy states is never medically necessary.

While DMEPOS competitive bidding is in a temporary “gap” period until 2021, the process of soliciting, analyzing, and awarding bids, as well as implementing the program takes approximately 18 months. The CMS announcement on March 7, 2019 sets the following timeline to assure that Competitive Bidding 2021 will begin on time.

March 7, 2019

- CMS begins pre-bidding supplier awareness program

May 2019

- CMS announces dates for registration and bidding
- CMS begins bidder education program

June 2019

- Bidder registration period begins
- Bid windows open

AOPA will be developing several resources to educate its members about the competitive bidding program. In the meantime, general information regarding Competitive Bidding 2021 may be found by clicking [here](#) or [here](#).

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

Jurisdiction D Releases Quarterly TPE Results

Noridian, the Durable Medical Equipment Administrative Contractor (DME MAC) for Jurisdiction D, recently published the quarterly results of their Target, Probe & Educate (TPE) audits. The audits are based on claims reviewed during October 2018-December 2018 and the results are as follows:

- Ankle Foot Orthoses/Knee Ankle Foot Orthoses (L4360, L4361, L4386 and L4387) had an overall claim potential improper payment rate, based on dollars, of 34%. This is the same overall claim potential improper payment rate as the last quarter’s results.
- Knee Orthoses (L1810, L1812, L1830, L1832, L1833, L1843, L1845 and L1852) had an overall claim potential improper payment rate, based on dollars, of 61%. This is the same overall claim potential improper payment rate as the last quarter’s results.
- Spinal Orthoses (L0625, L0626, L0627, L0630, L0631, L0637, L0641, L0642, L0643, L0648 and L0650) had an overall claim potential improper payment rate, based on dollars, of 47%. This is a decrease in overall claim potential improper payment rate from the last quarter’s results of 51%.
- Diabetic Shoes (A5500) had an overall claim potential improper payment rate, based on dollars, of 28%. This is a decrease in overall claim potential improper payment rate from the last quarter’s results of 36%.

The top and common denial reasons for all TPE results (in no order) are as follows:

- Documentation does not support basic coverage criteria.

- Documentation was not received in response to the Additional Documentation Request (ADR) letter.
- Claim is the same or similar to another claim on file.
- Documentation does not include verification that the equipment was lost, stolen or irreparably damaged in a specific incident.

View the complete results and a full list of denial reasons [here](#).

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

Medicare Announces Two New Proposed RAC Audits for O&P

The Center for Medicare and Medicaid Services (CMS) recently announced two new possible RAC audit topics for O&P suppliers. The first is a complex medical review for off-the-shelf knee orthosis described by codes L1812, L1820, L1830, L1831, L1833, L1836, L1848, L1850, L1851 and L1852. The second is a complex medical review for diabetic shoes and inserts and the codes affected are A5500 or A5501 billed with A5512 or A5513.

At this time Performant, the RAC contractor for Region 5 (which includes all O&P claims), has not listed these new topics as approved issues for review on their website.

View the Knee Orthosis proposal [here](#) and the Diabetic Shoe proposal [here](#).

Policy Forum Registration is Now Open for May 7-8!

Join us May 7-8 in Washington, DC for the 2019 Policy Forum. Now is the time to make your voice heard! [Registration is now OPEN!](#)

The Policy Forum is your best opportunity to learn the latest legislative and regulatory details and how they will affect you, your business and your patients. Once you are armed with the facts, we as a profession will educate our members of Congress to offer common sense solutions and share how the O&P profession restores lives and puts people back to work. Not familiar or intimidated by Washington D.C.? Take our new Lobbying 101 course that will provide you with simple and effective measures to familiarize you with laws, procedures, and how-to get your point of view across.



May 7-8, 2019
Washington, DC

Host Hotel: Ritz Carlton, Pentagon City
Arlington, VA

[Book your room online. Visit our website for more information on the Policy Forum.](#)

Take Advantage of AOPA's Career Center

Did you know that AOPA has a Career Center? The Career Center allows you to post any job and vocation openings for a one-time fee. You can access resumes, browse by features categories, listings, etc. Create an account with the Career Center and you now control every aspect of your job posting. The Career Center is a great tool for job seekers as well. Get constant alerts based on your created account preferences. Head to the [AOPA Career Center](#) to simplify your hiring processes.

Revision to the LSO/TLSO Policy Article

The Durable Medical Equipment Medicare Administrative Contractors (DME MAC) Noridian and CGS recently announced a revision to the LSO/TLSO Policy Article with an effective date of January 1, 2019. The revision provides guidance on the proper coding of prefabricated items which don't require substantial modification or minimal self-adjustment.

The revision indicates that when a HCPCS code descriptor does not define a brace as either off-the-shelf (OTS) or custom fitted, it only states prefabricated, the code should be used whether the device requires custom fitting or is delivered OTS. Here is the full passage from the Policy Article:

“In most cases for prefabricated orthoses, the correct coding of the orthosis is dictated by actions that take place at the time of fitting to the beneficiary, either custom-fit (requiring expertise) or off-the-shelf (OTS) (requiring minimal beneficiary self-adjustment). However, for certain types of orthoses, the HCPCS code narrative that best describes the product does not make a distinction between prefabricated orthoses that are provided as custom-fit or OTS. These code narratives are correct and must be used for Medicare billing, without regard to how the product is provided to the beneficiary at the final delivery.”

Previous interpretations by CMS indicated that if the LSO/TLSO HCPCS code only stated prefabricated, it was to be considered custom fitted by default. This interpretation was later reversed and is now clearly stated in the Policy Article.

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

New Legislative Focus in 2019

AOPA met with its lobbying team on January 31, to discuss its legislative strategy for the 116th Congress. The strategy session included members of AOPA's staff leadership and consultants from firms, McGuire Woods, Lincoln Policy Group, Linchpin Strategies, and Powers Law Firm. AOPA is working to shift the focus of its legislative initiatives from one that has historically been systems-focused, to one that brings the patient to the center of the conversation. Several of the same priorities found in the Medicare O&P Improvements Act will be included in new legislation, which will be focused on protection for patients and patients' access to quality orthotic and prosthetic care.

Thank you to our 2019 Supplier Plus Members

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Join the Coding & Billing Experts in Indianapolis

When: June 3-4, 2019

*Location: The Indianapolis Marriott Downtown
350 West Maryland Street
Indianapolis, Indiana 46225*

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.

At this seminar you will:

- Receive up-to-date information on Prior Authorization and other Hot Topics
- Ensure your Proof of Delivery meets Medicare Requirements
- Learn how to assess risk areas in your practice
- Learn successful appeal strategies and hints to avoid claim denials
- Practice coding complex devices, including repairs and adjustment
- Attend break-out sessions for practitioners and office staff
- Earn 14 CEs



Register Now

Questions regarding the seminar may be directed to Joe McTernan at (571) 431-0811 or Devon Bernard at (571) 431-0854.

Performant Announces New RAC Audit

Performant Recovery, the national Home Health, Hospice, and DMEPOS RAC contractor (Region 5), has announced that it will be initiating a post-payment automated review based on reasonable useful lifetimes (RUL) for select spinal orthoses. The spinal orthoses included in the audit are described by HCPCS codes L0627, L0631, L0637, L0642, L0648 and L0650. Performant Recovery added the review to its list of approved issues on January 1, 2019.

The RAC audit for RUL and spinal orthoses (L0627, L0631, L0637, L0642, L0648 and L0650) is the fourth O&P specific approved issue since the award of the new RAC contract to Performant Recovery. The RAC announcement on the automated review of select spinal orthoses may be found by [clicking here](#) and searching for issue 0128.

CMS Releases the 2019 Medicare DMEPOS Fee Schedule

The Centers for Medicare and Medicaid Services (CMS) has released the 2019 Medicare DMEPOS fee schedule which will be effective for Medicare claims with a date of service on or after January 1, 2019. The 2018 Medicare fee schedule for orthotic and prosthetic services will be increased by 2.3% over 2018 rates. The 2.3% increase is a net reflection of the 2.9% increase in the Consumer Pricing Index for Urban Areas (CPI-U) from June 2017 through June 2018, combined with the annual Multi-Factor Productivity Adjustment (MFP) of -0.6%.

The 2.3% increase in the O&P Medicare fee schedule for 2019 represents a 1.2% larger amount than the 2018 increase of 1.1%. Unfortunately, the 2% sequestration-based reduction to all Medicare payments remains in effect meaning that Medicare fee for service payments will continue to be reduced by 2% due to sequestration. While sequestration continues to impact Medicare reimbursement, it is not cumulative. You will still receive 2.3% more for a service you provide in 2019 than you did in 2018 since the 2% sequestration reduction would be applied to both claims.

[Click here to view and download the complete 2019 Medicare DMEPOS fee schedule.](#)

Updated Requirements for the RT and LT Modifiers

The Durable Medical Equipment Medicare Administrative Contractors (DME MACs) recently released a correct coding notification for the proper usage of the RT and LT modifiers; when billing for bi-lateral items/services on the same date of service.

Current rules for billing bilaterally direct you to use the RTLTLT modifier on the same claim line with two units of service.

However, **for claims with dates of service on or after March 1, 2019** you must bill each item on two separate claim lines using the RT and LT modifiers, and one unit of service on each claim line. Bi-lateral claims with a date of service on or after March 1, 2019 billed with the RTLTLT on a single claim line, will be rejected as incorrect coding.

HCPCS Code Changes for 2019

The Centers for Medicare and Medicaid Services (CMS) has released the new Healthcare Common Procedure Coding System (HCPCS) codes for 2019, and there were a few minor changes. Below is a complete breakdown of the code changes which will be effective for claims with a date of service on or after January 1, 2019.

New Codes

Code	Descriptor
A5514	For diabetics only, multiple density inserts, made by direct carving with cam technology from a rectified cad model created from a digitized scan of the patient, total contact with patient's foot, including arch, base layer minimum of 3/16 inch material of shore a 35 durometer (or higher), includes arch filler and other shaping material, custom fabricated, each
L8701	Powered upper extremity range of motion assist device, elbow, wrist, hand with single or double upright(s), includes microprocessor, sensors, all components and accessories, custom fabricated
L8702	Powered upper extremity range of motion assist device, elbow, wrist, hand, finger, single or double upright(s), includes microprocessor, sensors, all components and accessories, custom fabricated

Changes in Code Descriptors

Code	New Descriptor	Old Descriptor
A5513	For diabetics only, multiple density inserts, custom molded from model of patient's foot, total contact with patient's foot, including arch, base layer minimum of 3/16 inch material of shore a 35 durometer (or higher), includes arch filler and other shaping material, custom fabricated, each	For diabetics only, multiple density inserts, custom molded from model of patient's foot, total contact with patient's foot, including arch, base layer minimum of 3/16 inch material of shore a 35 durometer or higher, includes arch filler and other shaping material, custom fabricated, each

The change in the descriptor is a minor grammatical change, and not an actual change in the code verbiage. The new descriptor places parenthesis around the phrase or higher. The change makes the descriptor in line with the verbiage of the A5512 and the new A5514.

Deleted Codes

Code	Descriptor
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K0903	For diabetics only, multiple density inserts, made by direct carving with cam technology from a rectified cad model created from a digitized scan of the patient, total contact with patient's foot, including arch, base layer minimum of 3/16 inch material of shore a 35 durometer (or higher), includes arch filler and other shaping material, custom fabricated, each
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The temporary K code, K0903, which has been active since April 1, 2018 has been deleted and will be cross walked to the newly created A5514 code.

AOPA's Coding and Reimbursement Committee will review the list of changes and provide appropriate comments to CMS.

Upcoming AOPA Events

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| March 13, 2019 | <i>Advanced Beneficiary Notice: Get to Know the ABN Form</i>
AOPA Webinar
Learn more and register here |
| March 25, 2019 | <i>Call for Papers Deadline</i>
AOPA National Assembly
Learn more submit here |
| April 10, 2019 | <i>Shoes, External Breast Protheses, Surgical Dressings and Other Policies</i>
AOPA Webinar
Learn more and register here |