

Medicare Payments for O&P Services by Provider Type

The orthotic and prosthetic (O&P) community is interested in deterring fraudulent providers from providing orthotic or prosthetic care to Medicare beneficiaries. The community believes that one way to eliminate fraud would be for the Centers for Medicare & Medicaid Services (CMS) to enforce existing policy that unlicensed providers cannot receive payment for providing orthotic and prosthetic services to Medicare beneficiaries within a licensure state. The policy was passed by Congress as part of the Benefits Improvement and Protection Act of 2000 (BIPA Section 427) and mandated that within one year of enactment custom fabricated orthotics and all prosthetics must be provided by “qualified practitioners” and “qualified suppliers.” Transmittal 656, effective October 1, 2005, further mandated that CMS should only pay for O&P services for Medicare beneficiaries from practitioners and suppliers that meet state O&P licensure laws. However, no steps were taken to enforce either of these provisions. Fourteen states have enacted an O&P licensure statute; therefore, despite current practice, only certified personnel are authorized to provide O&P services to Medicare beneficiaries in those states.

To demonstrate the need for effective enforcement of the policy, the O&P community was interested in quantifying the proportion of services provided in O&P licensure states by unlicensed providers. A “60 Minutes” segment that aired on October 25, 2009 highlighted extensive fraudulent payments to unlicensed providers in Florida, which is an O&P licensure state. There was a desire to secure data as to whether such Medicare payment to unlicensed providers has been curtailed, or has continued, largely unabated.

The American Orthotic and Prosthetic Association (AOPA) commissioned Dobson DaVanzo & Associates, LLC (Dobson | DaVanzo) to analyze Medicare claims data from 2007 through 2011 to determine the extent to which Medicare is reimbursing non-certified O&P personnel in states with a licensure statute for selected O&P services. The analyses conducted by Dobson | DaVanzo was then compared to prior analyses of claims data conducted on behalf of AOPA from 2001 through 2006. This memo summarizes the findings and trends of the data analyses from 2007 to 2011 and compares them to the trends from 2001 to 2006.

Identifying Provider Certification Status through Medicare Claims

Prior to receipt of a Medicare provider number to administer O&P services to Medicare patients, providers are required to self-designate into one of the following personnel categories: O&P Personnel (certified orthotists and/or prosthetists), medical supply facility with certified O&P professional, hospital, pharmacy, physician, occupational or physical therapist, and medical supply facility without a certified O&P professional on its staff. After the provider receives a Medicare provider number, the category designation is generally not tracked by CMS for accuracy. This category designation is reported on every claim submitted to Medicare for reimbursement and included in the publicly available Medicare claims data in the provider specialty field.

While certification is not an absolute indicator that a provider is licensed, there is a strong correlation in licensure states between being certified and being licensed. That is, it is reasonable to expect that in states with licensure, there would be a higher proportion of practitioners with certifications than compared to states without licensure. Since a personnel category is designated for the entire billing entity (e.g., medical practice or supply company), one would also expect that the composition of the personnel might

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change within the entity over time. For example, a medical supply company identified to have no certified O&P professional may hire certified O&P personnel at a later time, without changing their CMS category designation. Despite the fact that the classification of the entity may change in practice, for the purpose of this analysis, we assume that the self-designated category reflects the true composition of the personnel providing the service.

Trends in Health Care Utilization by Certified and Non-Certified O&P Personnel

In order to determine the extent to which Medicare is reimbursing non-certified O&P personnel in states with O&P licensure statute, we conducted a DME claims analysis using the 5 percent sample limited data set (LDS) of Medicare beneficiaries from 2007 through 2011. For a subset of O&P services¹ we compared the allowed services reimbursed by Medicare by provider designation for three of the states with licensure – Florida, Illinois, and Texas – and overall across all three states.

Exhibit 1 presents the results of our analysis across the three states. Across all five years (2007-2011) and both orthotic and prosthetic service categories, in the aggregate, about one-third (32.3 percent) of Medicare allowed services were billed by certified O&P personnel. The remainder – 67.7 percent – was billed by other providers such as physicians and medical supply companies without certified O&P personnel.² Most states that have O&P licensure exempt physicians and therapists from those licensure requirements, which places particular emphasis on the subcategory of medical supply facilities that reported in their Medicare registration that they have no certified O&P personnel.

Orthotic base codes, comprising off-the-shelf, custom fitted high and low orthotics, and custom fabricated and fitted orthotics, are billed by certified O&P personnel for 31.6 percent of allowed charges. Prosthetic base codes are billed by certified O&P personnel for 84.1 percent of all allowed charges.

Exhibit 1: Percent of Allowed Services for O&P Services Billed by Certified O&P and Other Personnel (2007-2011)

O&P Service	Total Allowed Services (2007-2011)	Percent of Allowed Services Billed by Certified O&P Personnel (2007-2011)	Percent of Allowed Services Billed by Other Personnel (2007-2011)
All Orthotic Base Codes	3,574,020	31.6%	68.4%
Off the Shelf Orthotic	428,380	27.1%	72.9%
Custom-Fitted Low Orthotic	425,600	30.7%	69.3%
Custom-Fitted High Orthotic	2,114,520	31.0%	69.0%
Custom Fabricated & Fitted Orthotic	605,520	37.6%	62.4%
Prosthetic Base Codes	49,980	84.1%	15.9%
Total	3,624,000	32.3%	67.7%

Source: Dobson | DaVanzo analysis of DME services for 5% sample of Medicare beneficiaries (2007-2011), extrapolated to universe of Medicare beneficiaries.

In most service categories, the proportion of allowed services billed by certified O&P personnel have decreased over time, as other providers (non-certified O&P personnel) have increased their billing. This

¹ Services of interest include orthotic and prosthetic base, custom fabricated and fitted orthotic base, custom fitted high and low orthotic base, and off the shelf orthotic base codes.

² Since physicians are exempt from licensure requirements, we estimate that 63.8 percent of O&P services were provided by either certified O&P personnel or physicians. Therefore, about 36.2 percent of services across all categories were provided by other non-certified personnel from 2008 through 2011.

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trend suggests that reimbursement to non-certified O&P personnel has been allowed since the passage of BIPA and Transmittal 656. Furthermore, any actions by CMS to prohibit or reduce reimbursement to these non-certified providers have been unsuccessful.

In comparing the trends in health care utilization prepared on behalf of AOPA for 2001 through 2006 to the results above for 2007-2011, similar trends were observed, in that immediately following passage of BIPA and release of Transmittal 656, the proportion of allowed services billed by non-certified O&P personnel did not significantly decrease.

The percent of allowed services billed by certified O&P and other personnel by state and year is presented in the attached analyses.

Conclusions

The data from 2001 to 2006, and from 2007 to 2011, show that there has not been any significant change by CMS to eliminate payments to unlicensed providers in O&P licensure states. Specifically, no reduction in the proportion of payments to non-certified O&P personnel has been evidenced since 2009. In fact, the data show an increase in the proportion of Medicare payments to non-certified personnel in licensure states. Our analytic results are consistent with the results of a third party independent survey that confirmed that non-certified providers are continuing to provide O&P services to Medicare beneficiaries as recently as in 2013. If any CMS enforcement to eliminate payments to unlicensed providers in O&P licensure states has occurred, it does not appear to have been effective.

If CMS was to actively enforce that unlicensed providers cannot receive payment for providing O&P services to Medicare beneficiaries within a licensure state, Medicare savings could be realized. Under such enforcement of limiting payments to providers with proven licensure and standards of training and experience, payments to unqualified providers would be eliminated. As the “60-Minute” special suggested, allowing non-certified personnel to provide these services, especially in states with licensure, could lead to fraud and abuse in O&P services, as well as expose patients who received these services to inappropriate or substandard care. Therefore, shifting payments to only certified providers could result in better care for beneficiaries and lower Medicare payments.

All States

Base Code Summary by Supplier Classification - 2007-2011

Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	899,120	28%	28%
Medical Supply without O&P	906,000	29%	72%
Other	33,640	1%	
Pharmacy	277,320	9%	
Physician	1,048,980	33%	
Grand Total	3,165,060	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	963,800	28%	28%
Medical Supply without O&P	936,520	28%	72%
Other	46,820	1%	
Pharmacy	307,700	9%	
Physician	1,144,160	34%	
Grand Total	3,399,000	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	980,040	28%	28%
Medical Supply without O&P	879,120	25%	72%
Other	56,020	2%	
Pharmacy	314,820	9%	
Physician	1,245,640	36%	
Grand Total	3,475,640	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	959,080	27%	27%
Medical Supply without O&P	836,720	24%	73%
Other	73,760	2%	
Pharmacy	330,220	9%	
Physician	1,345,780	38%	
Grand Total	3,545,560	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	874,360	26%	26%
Medical Supply	807,320	24%	74%
Other	79,860	2%	
Pharmacy	299,600	9%	
Physician	1,333,880	39%	
Grand Total	3,395,020	100%	

All States

Base Code Summary by Supplier Classification - 2007-2011

Prosthetic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	46,460	89%	89%
Medical Supply without O&P	2,260	4%	11%
Other	420	1%	
Pharmacy	260	0%	
Physician	2,840	5%	
Grand Total	52,240	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	43,200	85%	85%
Medical Supply without O&P	3,720	7%	15%
Other	420	1%	
Pharmacy	340	1%	
Physician	3,340	7%	
Grand Total	51,020	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	44,760	86%	86%
Medical Supply without O&P	2,080	4%	14%
Other	320	1%	
Pharmacy	700	1%	
Physician	3,980	8%	
Grand Total	51,840	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	44,540	86%	86%
Medical Supply without O&P	2,100	4%	14%
Other	420	1%	
Pharmacy	560	1%	
Physician	4,100	8%	
Grand Total	51,720	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	39,960	85%	85%
Medical Supply	1,960	4%	15%
Other	500	1%	
Pharmacy	420	1%	
Physician	4,040	9%	
Grand Total	46,880	100%	

All States

Base Code Summary by Supplier Classification - 2007-2011

Custom Fabricated & Fitted Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	222,620	43%	43%
Medical Supply without O&P	98,140	19%	57%
Other	7,880	2%	
Pharmacy	29,840	6%	
Physician	160,300	31%	
Grand Total	518,780	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	233,180	40%	40%
Medical Supply without O&P	106,220	18%	60%
Other	17,960	3%	
Pharmacy	41,400	7%	
Physician	191,080	32%	
Grand Total	589,840	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	239,480	38%	38%
Medical Supply without O&P	109,520	17%	62%
Other	21,660	3%	
Pharmacy	44,040	7%	
Physician	217,960	34%	
Grand Total	632,660	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	239,100	36%	36%
Medical Supply without O&P	105,040	16%	64%
Other	26,800	4%	
Pharmacy	46,700	7%	
Physician	237,880	36%	
Grand Total	655,520	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	217,100	37%	37%
Medical Supply	76,600	13%	63%
Other	26,740	5%	
Pharmacy	40,020	7%	
Physician	227,260	39%	
Grand Total	587,720	100%	

All States

Base Code Summary by Supplier Classification - 2007-2011

Custom Fitted High Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	438,020	26%	26%
Medical Supply without O&P	511,760	31%	74%
Other	11,420	1%	
Pharmacy	157,020	9%	
Physician	541,280	33%	
Grand Total	1,659,500	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	477,560	27%	27%
Medical Supply without O&P	544,560	30%	73%
Other	15,000	1%	
Pharmacy	177,320	10%	
Physician	587,280	33%	
Grand Total	1,801,720	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	508,640	26%	26%
Medical Supply without O&P	544,100	28%	74%
Other	22,220	1%	
Pharmacy	199,320	10%	
Physician	669,820	34%	
Grand Total	1,944,100	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	499,260	25%	25%
Medical Supply without O&P	522,060	26%	75%
Other	34,520	2%	
Pharmacy	214,500	11%	
Physician	712,680	36%	
Grand Total	1,983,020	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	436,700	23%	23%
Medical Supply	510,980	27%	77%
Other	39,260	2%	
Pharmacy	200,980	11%	
Physician	679,820	36%	
Grand Total	1,867,740	100%	

All States

Base Code Summary by Supplier Classification - 2007-2011

Custom Fitted Low Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	119,540	28%	28%
Medical Supply without O&P	129,740	30%	72%
Other	6,160	1%	
Pharmacy	28,400	7%	
Physician	148,860	34%	
Grand Total	432,700	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	122,880	27%	27%
Medical Supply without O&P	130,040	29%	73%
Other	5,760	1%	
Pharmacy	27,260	6%	
Physician	161,900	36%	
Grand Total	447,840	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	119,140	28%	28%
Medical Supply without O&P	100,840	24%	72%
Other	5,040	1%	
Pharmacy	22,560	5%	
Physician	171,040	41%	
Grand Total	418,620	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	121,120	27%	27%
Medical Supply without O&P	96,860	22%	73%
Other	4,960	1%	
Pharmacy	20,520	5%	
Physician	203,460	46%	
Grand Total	446,920	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	125,360	26%	26%
Medical Supply	104,520	22%	74%
Other	5,860	1%	
Pharmacy	19,280	4%	
Physician	222,740	47%	
Grand Total	477,760	100%	

All States

Base Code Summary by Supplier Classification - 2007-2011

Off the Shelf Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	118,940	21%	21%
Medical Supply without O&P	166,360	30%	79%
Other	8,180	1%	
Pharmacy	62,060	11%	
Physician	198,540	36%	
Grand Total	554,080	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	130,180	23%	23%
Medical Supply without O&P	155,700	28%	77%
Other	8,100	1%	
Pharmacy	61,720	11%	
Physician	203,900	36%	
Grand Total	559,600	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	112,780	23%	23%
Medical Supply without O&P	124,660	26%	77%
Other	7,100	1%	
Pharmacy	48,900	10%	
Physician	186,820	39%	
Grand Total	480,260	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	99,600	22%	22%
Medical Supply without O&P	112,760	25%	78%
Other	7,480	2%	
Pharmacy	48,500	11%	
Physician	191,760	42%	
Grand Total	460,100	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	95,200	21%	21%
Medical Supply	115,220	25%	79%
Other	8,000	2%	
Pharmacy	39,320	9%	
Physician	204,060	44%	
Grand Total	461,800	100%	

Florida

Base Code Summary by Supplier Classification - 2007-2011

Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	81,380	31%	31%
Medical Supply without O&P	40,260	15%	69%
Other	6,900	3%	
Pharmacy	16,140	6%	
Physician	115,980	44%	
Grand Total	260,660	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	83,080	29%	29%
Medical Supply without O&P	50,720	18%	71%
Other	8,180	3%	
Pharmacy	19,700	7%	
Physician	122,440	43%	
Grand Total	284,120	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	95,900	30%	30%
Medical Supply without O&P	58,540	18%	70%
Other	7,540	2%	
Pharmacy	20,180	6%	
Physician	136,020	43%	
Grand Total	318,180	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	97,180	30%	30%
Medical Supply without O&P	59,120	18%	70%
Other	10,260	3%	
Pharmacy	16,100	5%	
Physician	144,680	44%	
Grand Total	327,340	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	87,600	29%	29%
Medical Supply	53,060	18%	71%
Other	7,080	2%	
Pharmacy	17,340	6%	
Physician	136,560	45%	
Grand Total	301,640	100%	

Florida

Base Code Summary by Supplier Classification - 2007-2011

Prosthetic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	3,300	92%	92%
other	280	8%	8%
Grand Total	3,580	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	2,820	84%	84%
Other	520	16%	16%
Grand Total	3,340	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	2,940	80%	80%
Other	720	20%	20%
Grand Total	3,660	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	2,900	82%	82%
Physician	620	18%	18%
Grand Total	3,520	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	2,360	89%	89%
Physician	300	11%	11%
Grand Total	2,660	100%	

Florida

Base Code Summary by Supplier Classification - 2007-2011

Custom Fabricated & Fitted Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	20,820	40%	40%
Medical Supply without O&P	6,080	12%	60%
Other	800	2%	
Pharmacy	4,100	8%	
Physician	20,700	39%	
Grand Total	52,500	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	18,580	32%	32%
Medical Supply without O&P	9,140	16%	68%
Other	1,840	3%	
Pharmacy	6,860	12%	
Physician	22,220	38%	
Grand Total	58,640	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	19,440	31%	31%
Medical Supply without O&P	9,540	15%	69%
Other	2,000	3%	
Pharmacy	6,240	10%	
Physician	26,440	42%	
Grand Total	63,660	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	20,620	34%	34%
Medical Supply without O&P	6,940	12%	66%
Other	1,840	3%	
Pharmacy	2,940	5%	
Physician	27,820	46%	
Grand Total	60,160	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	19,920	40%	40%
Medical Supply	1,180	2%	60%
Other	2,120	4%	
Pharmacy	1,020	2%	
Physician	25,020	51%	
Grand Total	49,260	100%	

Florida

Base Code Summary by Supplier Classification - 2007-2011

Custom Fitted High Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	46,380	30%	30%
Medical Supply without O&P	27,240	18%	70%
Other	1,440	1%	
Pharmacy	12,040	8%	
Physician	65,160	43%	
Grand Total	152,260	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	49,640	30%	30%
Medical Supply without O&P	33,060	20%	70%
Other	2,260	1%	
Pharmacy	12,840	8%	
Physician	68,960	41%	
Grand Total	166,760	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	58,340	30%	30%
Medical Supply without O&P	40,680	21%	70%
Other	2,000	1%	
Pharmacy	13,940	7%	
Physician	76,640	40%	
Grand Total	191,600	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	59,740	29%	29%
Medical Supply without O&P	45,940	23%	31%
Other	2,740	1%	
Pharmacy	13,160	6%	
Physician	81,380	40%	
Grand Total	202,960	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	51,140	27%	27%
Medical Supply	45,980	25%	73%
Other	4,300	2%	
Pharmacy	12,480	7%	
Physician	73,500	39%	
Grand Total	187,400	100%	

Florida

Base Code Summary by Supplier Classification - 2007-2011

Custom Fitted Low Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	8,080	29%	29%
Medical Supply without O&P	3,260	12%	71%
Other	1,560	6%	
Physician	14,640	53%	
Grand Total	27,540	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	8,840	30%	30%
Medical Supply without O&P	4,280	14%	70%
Other	1,380	5%	
Physician	15,380	51%	
Grand Total	29,880	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	11,980	34%	34%
Medical Supply without O&P	4,420	13%	66%
Other	1,080	3%	
Physician	17,680	50%	
Grand Total	35,160	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	11,160	31%	31%
Medical Supply without O&P	3,200	9%	69%
Other	1,340	4%	
Physician	20,200	56%	
Grand Total	35,900	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	10,580	28%	28%
Medical Supply	3,300	9%	72%
Other	360	1%	
Pharmacy	1,500	4%	
Physician	21,800	58%	
Grand Total	37,540	100%	

Florida

Base Code Summary by Supplier Classification - 2007-2011

Off the Shelf Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	6,100	22%	22%
Medical Supply without O&P	3,680	13%	78%
Other	3,100	11%	
Physician	15,480	55%	
Grand Total	28,360	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	6,020	21%	21%
Medical Supply without O&P	4,240	15%	79%
Other	2,700	9%	
Physician	15,880	55%	
Grand Total	28,840	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	6,140	22%	22%
Medical Supply without O&P	3,900	14%	78%
Other	2,460	9%	
Physician	15,260	55%	
Grand Total	27,760	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	5,660	20%	20%
Medical Supply without O&P	3,040	11%	80%
Other	4,340	15%	
Physician	15,280	54%	
Grand Total	28,320	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	5,960	22%	22%
Medical Supply	2,600	9%	78%
Other	300	1%	
Pharmacy	2,340	9%	
Physician	16,240	59%	
Grand Total	27,440	100%	

Texas

Base Code Summary by Supplier Classification - 2007-2011

Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	104,460	38%	38% <hr/> 62%
Medical Supply without O&P	84,020	31%	
Other	5,080	2%	
Pharmacy	22,520	8%	
Physician	57,580	21%	
Grand Total	273,660	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	116,220	39%	39% <hr/> 61%
Medical Supply without O&P	87,140	29%	
Other	5,920	2%	
Pharmacy	23,960	8%	
Physician	63,340	21%	
Grand Total	296,580	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	107,140	39%	39% <hr/> 61%
Medical Supply without O&P	64,080	23%	
Other	6,920	3%	
Pharmacy	25,120	9%	
Physician	70,920	26%	
Grand Total	274,180	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	92,920	35%	35% <hr/> 65%
Medical Supply without O&P	53,640	20%	
Other	9,660	4%	
Pharmacy	27,680	10%	
Physician	79,840	30%	
Grand Total	263,740	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	74,200	30%	30% <hr/> 70%
Medical Supply	53,340	22%	
Other	11,700	5%	
Pharmacy	24,000	10%	
Physician	80,880	33%	
Grand Total	244,120	100%	

Texas

Base Code Summary by Supplier Classification - 2007-2011

Prosthetic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	3,820	83%	83%
Other	380	8%	17%
Physician	400	9%	
Grand Total	4,600	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	3,260	81%	81%
Other	380	9%	9%
Physician	380	9%	
Grand Total	4,020	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	4,300	81%	81%
Other	580	11%	19%
Physician	420	8%	
Grand Total	5,300	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	3,980	82%	82%
Other	340	7%	18%
Physician	520	11%	
Grand Total	4,840	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	3,660	82%	82%
Physician	500	11%	18%
Other	320	7%	
Grand Total	4,480	100%	

Texas

Base Code Summary by Supplier Classification - 2007-2011

Custom Fabricated & Fitted Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	15,520	43%	43%
Medical Supply without O&P	5,500	15%	57%
Other	520	1%	
Pharmacy	6,580	18%	
Physician	7,960	22%	
Grand Total	36,080	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	15,900	40%	40%
Medical Supply without O&P	6,620	17%	60%
Other	1,180	3%	
Pharmacy	6,980	18%	
Physician	9,080	23%	
Grand Total	39,760	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	16,260	39%	39%
Medical Supply without O&P	5,500	13%	61%
Other	1,600	4%	
Pharmacy	6,760	16%	
Physician	12,020	29%	
Grand Total	42,140	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	15,080	34%	34%
Medical Supply without O&P	5,240	12%	66%
Other	2,460	5%	
Pharmacy	8,360	19%	
Physician	13,800	31%	
Grand Total	44,940	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	12,800	31%	31%
Medical Supply	5,660	14%	69%
Other	2,800	7%	
Pharmacy	6,220	15%	
Physician	13,220	32%	
Grand Total	40,700	100%	

Texas

Base Code Summary by Supplier Classification - 2007-2011

Custom Fitted High Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	67,280	41%	41%
Medical Supply without O&P	50,320	30%	59%
Other	480	0%	
Pharmacy	15,940	10%	
Physician	31,200	19%	
Grand Total	165,220	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	72,900	41%	41%
Medical Supply without O&P	52,660	30%	59%
Other	420	0%	
Pharmacy	16,980	10%	
Physician	34,000	19%	
Grand Total	176,960	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	65,740	39%	39%
Medical Supply without O&P	42,040	25%	61%
Other	2,080	1%	
Pharmacy	18,360	11%	
Physician	38,440	23%	
Grand Total	166,660	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	57,780	37%	37%
Medical Supply without O&P	35,120	22%	63%
Other	4,360	3%	
Pharmacy	19,320	12%	
Physician	41,140	26%	
Grand Total	157,720	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	41,360	29%	29%
Medical Supply	33,320	24%	71%
Other	7,360	5%	
Pharmacy	16,140	11%	
Physician	42,420	30%	
Grand Total	140,600	100%	

Texas

Base Code Summary by Supplier Classification - 2007-2011

Custom Fitted Low Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	13,420	32%	32%
Medical Supply without O&P	18,420	45%	68%
Other	820	2%	
Physician	8,640	21%	
Grand Total	41,300	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	12,040	30%	30%
Medical Supply without O&P	17,220	43%	70%
Other	860	2%	
Physician	9,720	24%	
Grand Total	39,840	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	8,240	29%	29%
Medical Supply without O&P	8,820	31%	71%
Other	480	2%	
Physician	10,820	38%	
Grand Total	28,360	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	9,180	29%	29%
Medical Supply without O&P	7,260	23%	71%
Other	840	3%	
Physician	14,320	45%	
Grand Total	31,600	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	12,980	35%	35%
Medical Supply	8,320	23%	65%
Other	760	2%	
Physician	14,600	40%	
Grand Total	36,660	100%	

Texas

Base Code Summary by Supplier Classification - 2007-2011

Off the Shelf Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	8,240	27%	27%
Medical Supply without O&P	9,780	31%	73%
Other	3,260	10%	
Physician	9,780	31%	
Grand Total	31,060	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	15,380	38%	38%
Medical Supply without O&P	10,640	27%	62%
Other	3,460	9%	
Physician	10,540	26%	
Grand Total	40,020	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	16,900	46%	46%
Medical Supply without O&P	7,720	21%	54%
Other	2,760	7%	
Physician	9,640	26%	
Grand Total	37,020	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	10,880	37%	37%
Medical Supply without O&P	6,020	20%	63%
Other	2,000	7%	
Physician	10,580	36%	
Grand Total	29,480	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	7,060	27%	27%
Medical Supply	6,040	23%	73%
Other	1,380	5%	
Pharmacy	1,040	4%	
Physician	10,640	41%	
Grand Total	26,160	100%	

Illinois

Base Code Summary by Supplier Classification - 2007-2011

Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	35,400	27%	27%
Medical Supply without O&P	42,300	32%	73%
Other	4,440	3%	
Pharmacy	3,700	3%	
Physician	46,340	35%	
Grand Total	132,180	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	37,020	26%	26%
Medical Supply without O&P	40,200	28%	74%
Other	5,020	4%	
Pharmacy	5,240	4%	
Physician	53,800	38%	
Grand Total	141,280	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	38,420	25%	25%
Medical Supply without O&P	44,080	29%	75%
Other	5,320	3%	
Pharmacy	7,320	5%	
Physician	58,020	38%	
Grand Total	153,160	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	41,600	27%	27%
Medical Supply without O&P	37,280	24%	73%
Other	6,040	4%	
Pharmacy	7,700	5%	
Physician	61,240	40%	
Grand Total	153,860	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	36,940	25%	25%
Medical Supply	38,660	26%	75%
Other	1,720	1%	
Pharmacy	10,340	7%	
Physician	61,660	41%	
Grand Total	149,320	100%	

Illinois

Base Code Summary by Supplier Classification - 2007-2011

Prosthetic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	2,080	85%	80%
Other	380	15%	20%
Grand Total	2,460	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	1,540	100%	100%
Other	0	0%	0%
Grand Total	1,540	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	1,520	84%	84%
Other	280	16%	16%
Grand Total	1,800	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	1,800	86%	86%
Other	300	14%	14%
Grand Total	2,100	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	1,740	86%	86%
Other	280	14%	14%
Grand Total	2,020	100%	

Illinois

Base Code Summary by Supplier Classification - 2007-2011

Custom Fabricated & Fitted Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	8,940	49%	49%
Medical Supply without O&P	1,600	9%	51%
Other	720	4%	
Physician	6,880	38%	
Grand Total	18,140	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	9,420	44%	44%
Medical Supply without O&P	2,340	11%	56%
Other	660	3%	
Physician	9,040	42%	
Grand Total	21,460	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	10,340	41%	41%
Medical Supply without O&P	3,440	14%	59%
Other	880	3%	
Physician	10,640	42%	
Grand Total	25,300	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	12,100	46%	46%
Medical Supply without O&P	1,920	7%	54%
Other	1,860	7%	
Physician	10,660	40%	
Grand Total	26,540	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	11,860	45%	45%
Medical Supply	2,600	10%	55%
Other	460	2%	
Pharmacy	520	2%	
Physician	10,800	41%	
Grand Total	26,240	100%	

Illinois

Base Code Summary by Supplier Classification - 2007-2011

Custom Fitted High Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	14,700	22%	22%
Medical Supply without O&P	23,520	35%	78%
Other	400	1%	
Pharmacy	3,700	6%	
Physician	24,940	37%	
Grand Total	67,260	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	16,540	22%	22%
Medical Supply without O&P	25,540	33%	78%
Other	340	0%	
Pharmacy	5,240	7%	
Physician	28,780	38%	
Grand Total	76,440	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	17,580	20%	20%
Medical Supply without O&P	30,760	35%	80%
Other	480	1%	
Pharmacy	7,320	8%	
Physician	31,600	36%	
Grand Total	87,740	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	19,720	22%	22%
Medical Supply without O&P	28,360	32%	78%
Other	660	1%	
Pharmacy	7,700	9%	
Physician	33,520	37%	
Grand Total	89,960	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	16,560	19%	19%
Medical Supply	28,980	34%	81%
Other	720	1%	
Pharmacy	7,820	9%	
Physician	30,900	36%	
Grand Total	84,980	100%	

Illinois

Base Code Summary by Supplier Classification - 2007-2011

Custom Fitted Low Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	5,700	32%	32%
Medical Supply without O&P	5,400	30%	68%
Other	1,340	8%	
Physician	5,300	30%	
Grand Total	17,740	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	5,240	32%	32%
Medical Supply without O&P	4,040	25%	68%
Other	1,160	7%	
Physician	5,860	36%	
Grand Total	16,300	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	4,680	29%	29%
Medical Supply without O&P	3,460	21%	71%
Other	1,180	7%	
Physician	6,800	42%	
Grand Total	16,120	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	4,680	30%	30%
Medical Supply without O&P	2,560	16%	70%
Other	900	6%	
Physician	7,680	49%	
Grand Total	15,820	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	3,780	24%	24%
Medical Supply	2,360	15%	76%
Other	260	2%	
Pharmacy	540	3%	
Physician	8,900	56%	
Grand Total	15,840	100%	

Illinois

Base Code Summary by Supplier Classification - 2007-2011

Off the Shelf Orthotic Base Code Allowed Services

Provider Sub-Category	2007 Allowed Services	Percent of Total	
Certified O&P Personnel	6,060	21%	21%
Medical Supply without O&P	11,780	41%	79%
Other	1,980	7%	
Physician	9,220	32%	
Grand Total	29,040	100%	

Provider Sub-Category	2008 Allowed Services	Percent of Total	
Certified O&P Personnel	5,820	21%	21%
Medical Supply without O&P	8,280	31%	79%
Other	2,860	11%	
Physician	10,120	37%	
Grand Total	27,080	100%	

Provider Sub-Category	2009 Allowed Services	Percent of Total	
Certified O&P Personnel	5,820	24%	24%
Medical Supply without O&P	6,420	27%	76%
Other	2,780	12%	
Physician	8,980	37%	
Grand Total	24,000	100%	

Provider Sub-Category	2010 Allowed Services	Percent of Total	
Certified O&P Personnel	5,100	24%	24%
Medical Supply without O&P	4,440	21%	76%
Other	2,620	12%	
Physician	9,380	44%	
Grand Total	21,540	100%	

Provider Sub-Category	2011 Allowed Services	Percent of Total	
Certified O&P Personnel	4,740	21%	21%
Medical Supply	4,720	21%	79%
Other	280	1%	
Pharmacy	1,460	7%	
Physician	11,060	50%	
Grand Total	22,260	100%	