



American Orthotic & Prosthetic Association

www.AOPAnet.org

**AOPA In Advance SmartBrief**  
**Breaking News**  
**March 26, 2020**

**AOPA Headlines:**

**[RAC Contractor Suspends New Additional Documentation Requests for At Least 30 Days](#)**

**[COVID-19 Update: Guidance on O&P Businesses Operations During State & Local Restrictions](#)**

**[AOPA's COVID-19 Responses, Guidance, and Resources](#)**

**[Certain Enrollment Procedures Waived for COVID-19](#)**

**[COVID-19: Impact of CMS Waivers on AOPA Members](#)**

**[CMS Releases a Provider Toolkit of Resources Related to COVID-19](#)**

**[2020 COPL RFP Deadline Extended to May 21st](#)**

**[AOPA Message on COVID-19](#)**

**[Policy Forum Update](#)**

**[DME MAC & PDAC Announce New Coding Verification Requirement](#)**

**[Revisions to the Lower Limb Protheses Policy](#)**

**[AOPA Participates in CMS Open Door Forum Call Regarding Medicare Prior Authorization for 6 Lower Limb Prosthesis HCPCS Codes](#)**

**[2020 National Assembly Call for Papers – Deadline Now April 3<sup>rd</sup>](#)**

**[Learn how the Co-OP will Elevate your Business with a FREE Tutorial](#)**

**[Upcoming Events](#)**

**RAC Contractor Suspends New Additional Documentation Requests for At Least 30 Days**

In response to CMS guidance as a result of COVID-19, Performant, the national RAC contractor for Medicare DMEPOS, Home Health, and Hospice claims has announced that, effective March 18, 2020, they have suspended the issuance of any new Additional Documentation Requests (ADRs) for a minimum of 30 days. This announcement provides some limited, temporary relief to providers struggling with COVID-19 related challenges in obtaining and maintaining appropriate documentation to support the medical need of services they are currently providing, never mind having to track down documentation for claims that were originally reimbursed several years ago.

In addition to suspending new ADR requests, Performant has indicated that any providers that require additional time to gather and submit requested documentation for ADRs received prior to

March 18<sup>th</sup> should contact RAC customer service by telephone at 866-201-0580 or by e-mail at [info@performantrac.com](mailto:info@performantrac.com).

Unfortunately, AOPA has confirmed that the suspension of the issuance of new ADRs has no impact on Performant's continued use of automated reviews for issues like reasonable useful lifetime (RUL). Performant has indicated that automated reviews will continue to occur under existing CMS guidelines.

AOPA will continue to monitor this situation and will provide any updates as they are made available.

Questions regarding this issue may be directed to Devon Bernard at [dbernard@AOPAnet.org](mailto:dbernard@AOPAnet.org) or Joe McTernan at [jmcternan@AOPAnet.org](mailto:jmcternan@AOPAnet.org).

### **COVID-19 Update: Guidance on O&P Businesses Operations During State & Local Restrictions**

As state and local governments begin to implement restrictions to population interaction in response to COVID-19, AOPA members have requested guidance regarding the continued operation of orthotic and prosthetic (O&P) businesses. AOPA has been monitoring developments on this issue closely and offers the following guidance based on the current available information.

As of March 23, 2020, at least 11 states (Delaware, Kentucky, Louisiana, Ohio, California, New Jersey, New York, Illinois, Connecticut, Oregon, and Pennsylvania) and multiple local municipalities have issued orders that restrict or close "non-essential" businesses until further notice. AOPA has reviewed each of these orders and found very consistent language that clearly considers the continued operation of healthcare facilities as "essential" services that are exempt. This exemption applies to both patients who may continue to receive care from healthcare facilities and employees who may continue to work at these facilities.

AOPA fully expects additional state and local authorities to follow suit and implement these restrictions but expects that O&P facilities will continue to be exempt from these restrictions. If additional restrictions are implemented that affect the continued operation of O&P businesses, AOPA will alert its members as soon as we receive the information.

AOPA urges O&P patient care facilities to carefully consider all factors when making decisions regarding the continuation of operations during COVID-19. While there is a clear exemption that permits O&P facilities to continue to operate during state and locally implemented restrictions, the decision on how to operate and how to interact with the public must be made with the best interest of your communities, your employees and, most of all, your patients. Additionally, AOPA highly recommends continued compliance with the [latest guidelines published by the Centers for Disease Control](#).

### **AOPA's COVID-19 Responses, Guidance, and Resources**

To say we are in unprecedented times would be an understatement. Since my last message, the American Orthotic and Prosthetic Association (AOPA) leadership has continued to closely follow the coronavirus disease (COVID-19) and its widespread impacts. We have also been taking your

calls and emails and hearing firsthand how extremely difficult and uncertain things are for you, your businesses, and your patients.

To that end, we are responding with support. We are responding with outreach to legislators about how they can best support the O&P profession. We are responding by providing guidance on regulations like documentation, telehealth, and stay at home orders. We are responding by pulling together resources. We are responding by creating a space on the Co-OP to share your experiences and strategies with one another.

All of this can be found on the newly developed [COVID-19 Response and Resources webpage](#). We will be updating this webpage frequently with actions, guidance, and resources as well as pushing out updates via email, Smartbrief, and our social media channels.

Thank you for all you continue to do for your patients and the O&P profession. The Board and staff are here to support you so that you can do this. If you have questions, concerns, or needs do not hesitate to reach out to any of the staff at [info@AOPAnet.org](mailto:info@AOPAnet.org).

### **Certain Enrollment Procedures Waived for COVID-19**

In response to COVID-19, the Centers for Medicare and Medicaid Services (CMS) continues to use its authority to issue waivers to temporarily suspend or modify certain Medicare requirements to ensure Medicare beneficiaries continue to receive prompt and proper care.

As part of these efforts CMS has made the following modifications to the enrollment process for all DMEPOS suppliers:

- CMS and the National Supplier Clearing House (NSC) will expedite any pending or new applications received on or after March 1, 2020. If there are no issues with your CMS-855S form your application will be processed within 7 business days (if submitted online), and 14 business days (if submitted by paper).
- CMS and the NSC will be waiving the following screening requirements for all enrollment applications received on or after March 1, 2020: the supplier application fee, criminal background checks, and site visits.
- CMS and the NSC will be posting all revalidation actions and deadlines.
- CMS is postponing all accreditation and reaccreditation timetables and deadlines

If you have any questions about how these waivers and modifications effect your current or future enrollment applications contact the NSC at 1-866-238-9652. This toll-free line was established specifically for questions about the above-mentioned waivers.

If you have specific questions about the postponing of accreditation timetables and deadlines, you may want to contact your accrediting organization directly.

## COVID-19: Impact of CMS Waivers on AOPA Members

On March 13, 2020, President Trump issued an emergency declaration under the Stafford Act and the National Emergencies Act to help address issues being caused by the spread of the coronavirus disease (COVID-19). As part of this declaration, the Centers for Medicare and Medicaid Services (CMS) put in place certain blanket waivers to help Medicare beneficiaries impacted receive prompt care.

The two issues of importance to American Orthotic and Prosthetic Association (AOPA) members are the proposed relaxation of existing requirements for telehealth visits and the relaxation of the referring practitioner documentation requirements for replacement of orthoses and prostheses.

AOPA has been in contact with the DME MACs to discuss actions that they will take to implement the provisions of these emergency-based waivers. While they are awaiting specific guidance from CMS on how to properly implement, they have indicated that CMS intends to make every effort to ensure that Medicare and Medicaid beneficiaries continue to have complete access to clinically appropriate medical care. In the meantime, AOPA members should continue to make every effort to obtain appropriate documentation to support the O&P services they provide.

CMS has issued the following guidance regarding replacement of DMEPOS during the state of emergency: "Where Durable Medical Equipment Prosthetics, Orthotics, and Supplies (DMEPOS) is lost, destroyed, irreparably damaged, or otherwise rendered unusable or unavailable, contractors have the flexibility to waive replacements requirements such that the face-to-face requirement, a new physician's order, and new medical necessity documentation."

When providing a replacement item under this waiver, suppliers are reminded to include a narrative description explaining why the item needs to be replaced with their claims and must maintain documentation for the need of the replacement item. Suppliers must also use the CR modifier on their claims. CMS has also declared that the documentation waiver is retroactive to dates of service on or after March 1, 2020. Find more information on the waiver [here](#).

For more information on telehealth, read [Medicare's Telemedicine Fact Sheet](#) and the companion [Medicaid piece](#).

AOPA remains committed to making sure its members can continue to provide clinically appropriate, medically necessary care with minimal interruption as a result of COVID-19. To this end, AOPA will continue to provide additional information and resources as they become available.

## CMS Releases a Provider Toolkit of Resources Related to COVID-19

The Centers for Medicare & Medicaid Services (CMS) has released a [Virtual Toolkit](#) to help providers stay up-to-date on CMS materials available on COVID-19. The toolkit provides multiple links to valuable information for providers, caregivers, Medicare beneficiaries, and other CMS partners.

AOPA believes that the toolkit is a valuable resource and encourages AOPA members to review and utilize the resources as needed.

Questions? Contact Joe McTernan at [jmcternan@AOPAnet.org](mailto:jmcternan@AOPAnet.org) or Devon Bernard at [dbernard@AOPAnet.org](mailto:dbernard@AOPAnet.org).

### 2020 COPL RFP Deadline Extended to May 21st

We know many are dealing with major disruptions to their daily lives. To accommodate this, we have decided to extend the deadline for the Center for Orthotic and Prosthetic Learning and Outcomes/Evidence-Based Practice's (COPL) [2020 Request for Pilot Grant Proposals](#). Proposals will now be due **May 21, 2020**.

For 2020-2021, COPL is seeking proposals in 10 potential areas of orthotic and prosthetic research including an open topic at two funding levels for one-time grants, \$15,000 and up to two exceptional proposals for \$30,000 for one year. Preference will be given to grants that address evidence-based clinical application in orthotics and prosthetics. [View the RFP topics and guidelines and then apply online](#).

If you have any questions, please contact AOPA's Director of Strategic Alliances, Ashlie White, at [awhite@AOPAnet.org](mailto:awhite@AOPAnet.org) or 571/431-0812.

### AOPA Message on COVID-19

Like all of you, the American Orthotic and Prosthetic Association (AOPA) leadership is closely following the coronavirus disease (COVID-19). As you have likely heard, we have made the tough decision to cancel several of our upcoming events in light of it.

We know that these are difficult and uncertain times for you and your patients. Please know, the Board and staff are here to support you so that you can continue to provide quality care to your patients.

As the situation evolves daily, we encourage you to follow the guidance being issued from the Centers for Disease Control and Prevention (CDC), the World Health Organization, and your local, state, and the federal governments. Specifically, the [CDC has this webpage](#) with resources and guidance for healthcare facilities. AOPA will continue to monitor the situation and provide guidance as appropriate.

Thank you for all you do for your patients and the O&P profession. As always do not hesitate to contact any of the AOPA staff with questions, concerns, or needs.

Stay safe and well.

### Policy Forum Update

The American Orthotic and Prosthetic Association (AOPA) leadership has been monitoring the COVID-19 developments and after careful consideration has decided to cancel the 2020 Policy Forum scheduled for May 5-6 in Washington DC. This was an extremely difficult decision given the importance of our advocacy agenda, but ultimately the health and safety of our members and their patients were the top priority.

However, this doesn't mean we won't be taking our issues to policymakers. Instead of the in-person event, we are in the process of developing a virtual version of the Policy Forum to be held on the same days. To advance our agenda we need your voices so, please continue to hold those dates on your calendar. We will be in touch soon with additional information.

Thank you for your understanding as well as your continued support and advocacy of the O&P profession and the patients its serves.

If you have any questions contact Justin Beland, AOPA's Director of Government Affairs at [jbeland@AOPAnet.org](mailto:jbeland@AOPAnet.org) or 571/431-0814.

### **DME MAC & PDAC Announce New Coding Verification Requirement**

The DME MACs and PDAC recently released a joint announcement for a new coding verification requirement for L3960 (SEWHO, abduction positioning, airplane design, prefabricated, includes fitting and adjustment). For all claims with a date of service on or after August 1,2020 the only braces which maybe billed using L3960 must have a written PDAC coding verification and listed on the PDAC Product Classification list.

The joint announcement also included new coding guidelines for the L3960. According to the announcement the L3960 is used for abducting the arm away from the body and capable of immobilizing the shoulder, elbow, wrist, and hand. It contains adjustable rigid cuffs and joints/components to optimize the shoulder, elbow, wrist and hand angles; the shoulder position is capable of 90 degrees abduction from torso. It also contains adjustable rigid chest and pelvic frames, or panels supports shoulder and arm components; and the L3960 is considered all-inclusive of soft interface and closures/straps.

Questions? Contact Joe McTernan at [jmcternan@AOPAnet.org](mailto:jmcternan@AOPAnet.org) or Devon Bernard at [dbernard@AOPAnet.org](mailto:dbernard@AOPAnet.org).

### **Revisions to the Lower Limb Protheses Policy**

On March 12, 2020 the DME MACs released a revised Lower Limb Protheses Policy. Most of the revisions were clerical and organizational in nature, such as listing out all codes instead of printing them in ranges, changing "ordering physician" to "treating practitioner", and updating the policy with the new standard written order (SWO) instructions. The Policy Article was reorganized to have direct headings and sections for knees, sockets, ankles and feet.

AOPA's Coding & Reimbursement Committee is reviewing the revisions and will provide the DME MACs with appropriate recommendations and concerns if necessary.

Questions? Contact Joe McTernan at [jmcternan@AOPAnet.org](mailto:jmcternan@AOPAnet.org) or Devon Bernard at [dbernard@AOPAnet.org](mailto:dbernard@AOPAnet.org).

### **AOPA Participates in CMS Open Door Forum Call Regarding Medicare Prior Authorization for 6 Lower Limb Prosthesis HCPCS Codes**

On March 11, AOPA participated in a Medicare Open Door Forum call that provided sub-regulatory guidance on the upcoming implementation of Medicare prior authorization for six lower limb

prosthesis HCPCS codes. The call was hosted by the Centers for Medicare and Medicaid Services (CMS) and was led by Amy Cinquegrani and Dr. Scott Lawrence of the Medicare Division of Payment Methods and Strategies. The four DME MAC Medical Directors also participated in the call and the question and answer period that followed it. The presentation that was used as an outline was published in advance by CMS and may be accessed [here](#). For additional information on Medicare prior authorization read [AOPA's initial announcement](#) from February 11.

During the call, AOPA had the opportunity to request clarification regarding several issues that CMS had previously indicated would be addressed through sub-regulatory guidance. New information received during the call included the following:

- DME MACs will issue decisions on initial prior authorization requests within 10 business days of receipt of the request.
- DME MACs will issue decisions on prior authorization resubmissions within 10 business days of receipt of the request (previous Medicare prior authorization programs allowed 20 business days for prior authorization resubmissions).
- DME MACs will issue decisions on expedited prior authorization requests within two business days of receipt. In order to be approved, an expedited request must show that the beneficiary's life or health is in immediate danger.
- Prior authorization requests may be submitted through multiple channels including electronic submission, submission through the DME MAC claim portal, by fax, and by mail.
- For the four states (PA, MI, TX, CA) scheduled for implementation of prior authorization for dates of service on or after May 11, 2020, the DME MACs will begin accepting prior authorization requests on April 27, 2020. For national implementation for dates of service on or after October 8, 2020, the DME MACs will begin accepting prior authorization requests on September 24, 2020.
- HCPCS codes that receive provisional affirmation will not be subject to additional medical review except for random CERT review and UPIC (fraud and abuse) review. This only applies to the six HCPCS codes subject to Medicare prior authorization.
- DME MACs will provide education when prior authorization requests are denied, allowing providers to correct errors and facilitate re-submission.
- CMS and DME MACs will closely monitor efforts to adhere to established timeframes for initial decisions and re-submissions.
- Prior authorization requests will be subject to existing Medicare policy governing coverage of lower limb prostheses. No changes are being made to the LCD or Policy Article as a result of prior authorization.

AOPA continues to be encouraged by the communication efforts of CMS and the DME MACs regarding the implementation of Medicare prior authorization. While some uncertainty remains, AOPA is confident that Medicare prior authorization can be beneficial to Medicare beneficiaries, providers, and the Medicare program.

AOPA will continue to communicate information regarding Medicare prior authorization to our members and will be developing educational resources that will help AOPA members to better understand the program and contribute to its success.

## 2020 National Assembly Call for Papers – Deadline Now April 3rd

Contribute to high-value clinical and scientific offerings and share your expertise with over 2,000 orthotic, prosthetic, and pedorthic professionals. Submit your proposal for the American Orthotic and Prosthetic Association's 2020 National Assembly, September 9-12, 2020 in Las Vegas, NV.

We are looking for:

- [Clinical Free Papers](#) - The top scoring papers will compete for the prestigious Thranhardt Award.
- [Technician Program](#)
- [Symposia](#)
- [Business Education Program](#) - The top papers will be considered for the prestigious Sam E. Hamontree, CP (E) Business Education Award.

Abstracts will be considered for both podium and poster presentations and must be submitted electronically; e-mail or fax submissions will not be accepted. Each submission will be graded by the review committee via a blind review process, based on the following criteria.

- Relevance, level of interest in categories
- Quality of scientific content
- Quality of clinical content
- Quality of technical content

**What are you waiting for? Advance your career. Gain recognition. See your name in lights. [Submit your abstract by April 3, 2020 EOB.](#)**

Questions about the submission process or the National Assembly? Contact AOPA at 571/431-0876.

## Learn how the Co-OP will Elevate your Business with a FREE Tutorial

Are you utilizing your AOPA membership? Attend the upcoming live tutorial to learn about one of the best resources available for O&P practices, the [AOPA Co-OP](#).

A Wikipedia for all things O&P, the Co-OP is a one-stop resource for information about reimbursement, coding, and policy. It is searchable database that provides up-to-date information on developments in Medicare policy, state-specific legislation, private-payer updates, and more. Members can access detailed information on everything from modifiers to product-specific L Codes and associated policies. Additionally, members can share information and insights on developments impacting the entire O&P profession.

If you haven't signed up for the Co-OP yet, this is your opportunity to learn about O&P's most comprehensive resource for coding, billing, and reimbursement. AOPA's Director of Strategic Initiatives, Ashlie White will demonstrate how to use the Co-OP and answer all your questions.

Pick the date using the drop-down menu. Register now for FREE:

- [Friday, April 17 at noon ET](#)
- [Friday, May 15 at noon ET](#)



## Upcoming Events

- |                |  |
|----------------|--|
| April 3, 2020  | <i>Call for Papers Deadline - EOB</i><br><a href="#">Submit your papers</a>                                    |
| April 8, 2020  | <i>Policy Review: LSO/TLSO</i><br>AOPA Webinar<br><a href="#">Learn more and register</a>                      |
| April 17, 2020 | <i>FREE Co-OP Tutorial</i><br><a href="#">Register online</a>  |
| May 13, 2020   | <i>Social Media Mayday: Increase Your Footprint</i><br>AOPA Webinar<br><a href="#">Learn more and register</a> |
| May 21, 2020   | <i>COPL Grant Proposal Deadline – EOB</i><br><a href="#">Apply online</a>                                      |