



American Orthotic & Prosthetic Association

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October 20, 2020

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2021 Medicare O&P Fee Schedule Update

The Centers for Medicare and Medicaid Services (CMS) has published an update on the economic factors that are used to calculate the Medicare O&P fee schedule. The annual Medicare fee schedule increase for O&P services is based on a combination of change in the Consumer Pricing Index for Urban Areas (CPI-U) from June to June of the previous year combined with the annual Multi-Factor Productivity Adjustment (MFP).

CMS recently announced that the CPI-U for June 2019 through June 2020 is 0.6% and the annual MFP adjustment is -0.4% for a net increase of 0.2%. While CMS has not officially announced the 2021 update to the Medicare O&P fee schedule, the announcement of the CPI-U and MFP adjustment lead to relative confidence in the 2021 increase of 0.2%.

The 0.2% increase in the O&P Medicare fee schedule for 2021 is slightly lower than the 2020 increase of 0.9%. While the Medicare 2% sequestration-based reduction to all Medicare payments has been suspended through dates of service through December 31, 2020 as a result of the CARES Act, continued suspension of sequestration-based fee reduction will require additional legislative action. AOPA is following this issue closely and supports the continued suspension of sequestration-based fee reductions.

Questions regarding the 2021 Medicare fee schedule may be directed to Joe McTernan at jmcternan@aopanet.org or Devon Bernard at dbernard@aopanet.org.

CGS Announces New Audits for AFOs

CGS, the DME MAC for Jurisdictions B&C, [has just announced](#) that they will be conducting complex post-payment reviews for a series of prefabricated ankle-foot-orthoses. The reviews will be focused on claims for the HCPCS codes: L1902, L1906, L1971, L4396, and L4397.

If you receive additional documentation requests as part of these reviews be sure to respond to them, however suppliers should be reminded that CMS has implied that the DME MACs may allow for flexibility with extensions based on the supplier's ability to complete the audit; based on the current public health emergency.

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

Introducing AOPA Connection

Welcome to AOPA Connection, your one-stop-shop for all things AOPA.

Logging into AOPA Connection you will instantly have access to all your AOPA benefits, including:

- AOPAversity
- Your Membership Record
- Your Individual Profile
- Event Calendar



- Bookstore (including past purchases)
- Co-OP

But, it doesn't stop there! We are pleased to introduce a new benefit accessible through AOPA Connection, My O&P Community. In this online community of your O&P colleagues you can get guidance, share advice, have one-on-one and group conversations, and access resources.

For Primary/Principal Member Contacts:

- For security reasons, we couldn't bring over passwords during conversion from our old database, so you get to start fresh. To access AOPA Connection click [here](#) and enter your unique email address to reset your password. Then, just follow the instructions for logging in. Note: accounts are tied to email addresses.
- If for some reason you are told your email is not found, create an account [here](#).
- If, you had multiple emails addresses in the old database and receive this email to all accounts please contact us at info@AOPAnet.org and we will help you reconcile your accounts.
- Once logged in be sure to complete your profile, this will help us better meet your needs as well as allow others to connect with you. Once you do this, play around with all the features, re-familiarize yourself with all the AOPA benefits, check out the discussions happening in My O&P Community.
- You can set all your employees up with their own credentials so they too can access all the AOPA member benefits. Spread the word, send them [here](#) and tell them to setup an account using their unique email and follow the instructions to link to your organization's name.

For Employees of Members:

- Accessing AOPA Connection is simple, all you need to do is set up your account [here](#) using your unique email and follow the instructions to link to your organization's name.
- Once logged in be sure to complete your profile, this will help us better meet your needs as well as allow others to connect with you. Once you do this, play around with all the features, re-familiarize yourself with all the AOPA benefits, check out the discussions happening in My O&P Community.

Questions? Check out these [Tips for Logging In](#). Still have questions? Contact Betty Leppin at bleppin@AOPAnet.org or 571-431-0876.

Appeals Update: The Amounts in Controversy for 2021 Have Been Released

The Amount in Controversy (AIC) is the monetary threshold required to file an appeal at the Administrative Law Judge (ALJ), third level of appeal, or the Federal District Court Review, the fifth level of appeal. The AIC for ALJ hearing requests filed on or before December 31, 2020, will remain

\$170. ALJ hearing requests filed on or after January 1, 2021 the AIC will increase to \$180. The AIC for the fifth level is currently \$1,670 and will increase to \$1,760 for filed on or after January 1, 2021.

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

Important Information on Medicare Accelerated and Advance Payment Program

Congress has passed a short-term spending bill to keep government programs operating at 2020 funding levels through December 11. Included in the 115-page bill are important revisions to the Medicare Accelerated and Advance Payments Program (AAP) that extends the deadline for providers to start repaying Medicare advance payment loans. AOPA worked closely with our congressional champions to ensure this was included in the final bill.

Under the AAP program, the Centers for Medicare and Medicaid Services (CMS) offered to advance money to providers to help keep their doors open during the early months of the pandemic. These loans, however, had to be paid back later out of Medicare payments to practices. As currently written, the terms for repayment are problematic, especially considering the current financial difficulties being experienced by providers during the pandemic. Providers would have 100 percent of their Medicare claims withheld to repay the loans on a short timeline, and after a few months any outstanding balances, would be subject to a 10.25 percent interest rate.

However, the bill passed today by Congress and expected be signed into law shortly by President Trump:

- Postpones the recoupment of disbursed funds until one year after the advance payment has been issued to a physician practice; the balance would be due by September 2022.
- Reduces the per claim recoupment amount from 100 percent to 25 percent for the first 11 months and 50 percent of claims withheld for an additional six months. The interest rate kicks in if not repaid in full; however, the bill lowers the interest rate from 10.25 percent to four percent.

AOPA was pleased to see our efforts on this issue pay off. We continue to push Congress for additional benefits for orthotists and prosthetists, including a statutory separation of O&P from DME, tax deductions on Personal Protective Equipment, and ensuring providers are not required to pay taxes on Provider Relief Fund disbursements. We encourage you to utilize our AOPAVotes.org page to write your legislators on these issues.

For questions, please contact [Justin Beland](mailto:Justin.Beland@AOPA.org), Director of Government Affairs.

FDA Online Research Survey

The Human-Device Interaction Lab at the FDA, in collaboration with Arm Dynamics, is collecting responses from individuals with upper limb amputation to understand upper limb amputee perspectives, covering categories such as function of their prosthesis, level of independence performing a variety of functional activities, comfort related to aspects of wear, any pain and sensation issues they may be experiencing, as well as the physical and mental burden experienced when using the prosthesis. This work is relevant to understanding the effectiveness of innovative

restorative devices and developing ways to evaluate these devices. We are currently recruiting adults (ages 18 and up) who have an upper limb amputation at any level.

Participants may be asked to respond to survey questions about device use, satisfaction, quality-of-life, and pain. The survey is expected to take less than 20 minutes to complete and administered online, so it can be accessed on any device with internet connection. All responses are confidential; no identifiable information will be linked to your responses.

Please contact Dr. Kimberly Kontson at kimberly.kontson@fda.hhs.gov with the email subject "SURVEY" or call (301) 796-4990 if you are interested or if you have any questions.

Virtual Coding & Billing Seminar

Wondering what is going on in regard to O&P coding, billing, and reimbursement policy?

Then, join our experts November 9 and 10 for the [AOPA Virtual Coding and Billing Seminar](#). It is what you've come to expect from our Coding and Billing seminars but tweaked and condensed slightly to offer it virtually. Content will be presented from 12-4pm ET both days.

The cost before October 20 is \$295 for members and \$395 for nonmembers. After that the cost increases to \$320 for members and \$420 for nonmembers. Bonus, if you register by October 20 you will receive a FREE 2020 Quick Coder.

Attendees will earn 8 CE credits.

Get the latest on coding, billing, and reimbursement policy, register for the Virtual Coding and Billing Seminar today. Have specific coding or billing questions, submit them when you register!

Questions? Contact Devon Bernard at dbernard@AOPAnet.org.

COVID-19 Update: Provider Relief Fund Reporting

On September 19, 2020, the US Department of Health and Human Services (HHS) released [guidance](#) articulating how to account for lost revenues and expenses and addressing recipient reporting requirements for those receiving Provider Relief Fund (PRF) payments. The guidance applies generally to PRF recipients that received one or more PRF payments exceeding \$10,000.

The \$10,000 reporting threshold is a notable change from the statutory requirement in Section 15011 of the CARES ACT; which (and the [Provider Relief Fund Terms and Conditions](#)) had required recipients of more than \$150,000 in total funds appropriated under the CARES Act to submit a report to HHS within 10 days following the end of each calendar quarter. While the new guidance lowers the reporting threshold to \$10,000, it

does not clarify if HHS's public reporting will continue to satisfy the Section 15011 requirement and did not further specify how (or whether) the reporting information announced in the guidance relates to the Section 15011 requirement. We expect further guidance on the issue, and will report when additional guidance is released. Recipients should continue to monitor the [PRF FAQs](#) for additional clarifications on reporting requirements.

The new guidance stipulates that recipients will report on the use of their PRF payments by first submitting information on healthcare-related expenses that are directly attributable to coronavirus. This may include general and administrative expenses and/or healthcare-related operating expenses. Any PRF payment amounts that were not fully expended on healthcare-related expenses attributable to coronavirus are then applied to the provider's "lost revenues," which, under the new guidance, are now defined as "year-over-year net patient care operating income (i.e., patient care revenue less patient care related expenses)." This definition is more limited than previous HHS guidance which permitted "any reasonable method of estimating lost revenue;" providers could compare budgeted to actual or use a year-over-year comparison. In addition, HHS appears to cap the application PRF payments toward lost revenues up to either the amount of a provider's 2019 net gain from healthcare related sources or up to a net zero gain/loss in 2020, if the provider reported negative net operating income in 2019. HHS seems to have provided this clarification because, under previous guidance, if lost revenues could be applied to expenses irrespective of the impact on margin, it would have introduced the possibility of PRF funding making a healthcare provider more profitable in 2020 than it was in 2019. AOPA is concerned about the potential impact of this approach for some providers and will continue to monitor the issue.

Recipients that do not use the full amount of their PRF funds by the end of calendar year 2020 will have an additional six months to use the remaining amounts. The extra six-month reporting period (January-June 2021) will be compared to the same period in 2019 for the purposes of making calculations.

The new guidance stipulates that recipients will be required to report several data elements, including demographic information, information about their expenses attributable to coronavirus, information about their lost revenues, and other non-financial information (such as metrics on personnel, patients, and facilities). Recipients that received between \$10,000 and \$499,999 in aggregated PRF payments must report healthcare-related expenses attributable to coronavirus in two aggregated categories: (1) general and administrative expenses and (2) other healthcare-related expenses. Providers receiving \$500,000 or more in PRF payments will report their expenses in greater detail within each of these categories.

The guidance has also pushed the reporting window, the reporting portal will be available in early 2021 (instead of on October 1, 2020). The other deadlines appear to remain unchanged, but these deadlines may be adjusted as the reporting mechanism is gradually rolled out. Important reporting deadlines include:

- All recipients must report within 45 days of the end of the calendar year 2020. (This would fall on Sunday, February 14; the actual deadline will likely be clarified as Monday, February 15.)
- Recipients who have expended funds in full prior to December 31, 2020, may submit a single final report at any time during the first reporting window (early 2021 through February 15, 2021).
- Recipients with funds still unexpended after December 31, 2020, must submit a second and final report no later than July 31, 2021.

Finally, the new guidance does not change HHS' previous clarifications that payments from the PRF qualify as disaster relief payments and are therefore taxable income. AOPA continues to work with Congress on [bipartisan legislation](#) which would ensure that CARES Act PRF payments are not includible in gross income.

AOPA will continue to follow this and all CARES Act-related guidance. If you have any questions, please contact [Justin Beland](#), Director of Government Affairs.

AFO/KAFO Policy Article

Recently, AOPA asked the DME MACs to clarify this existing language in the AFO/KAFO Policy Article related to custom fabricated braces: *In addition, if the item is custom fabricated, a complete and clear description of the item, including what makes this item unique, and a breakdown of charges (material and labor used in fabrication). This information should be entered in the narrative field of an electronic claim.*

On September 3, AOPA [reported and confirmed](#) that there has been no change to the documentation requirements for custom fabricated AFOs/KAFOs and the above passage is in reference to miscellaneous or unlisted codes. The DME MACs also stated they will clarify this in a future Policy Article revision.

The DME MACs just released the following revised AFO/KAFO Policy Article, and as promised they clarified the custom fabrication language: *If the item is custom fabricated and does not have a specific HCPCS code, a complete and clear description of the item, including what makes this item unique, and a breakdown of charges (material and labor used in fabrication) should be entered in the narrative field of an electronic claim or on Item 19 of a paper claim. (Refer to the LCD-related Standard Documentation Requirements article (A55426) for more information regarding billing of items with HCPCS codes that include miscellaneous, NOC, unlisted, or non-specified in their narrative descriptions.)*

The revised AFO/KAFO Policy Article will be effective October 1, 2020. A copy of the revised article can be found [here](#).

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

2020 Virtual National Assembly, Content to Remain Available Through 2020

Thank you for attending the 2020 Virtual National Assembly, your participation helped make it a success!

Please take a minute to complete the [Attendee Evaluation](#) so that we can continue to improve your Assembly experience.

A huge bonus to this year's Assembly is you still have access to all the content, both the education and the exhibits. And, we are excited to announce that the platform will remain open for the remainder of 2020 (not just through October 12). To access it, login like you did during the Assembly. Once in you can watch any presentations you missed or review a session you attended.

If a presenter made their slides available, you can download these as well. The exhibit booths, including exhibitors' contact information are still accessible too, so stop by and check them out.

This means you now have until the end of 2020 to earn over 100 CE credits. AOPA will send CE credit information to ABC and BOC mid-October, mid-November, and at the end of the year.

Thank you again for your participation! Be sure to save the date for the 2021 National Assembly, September 9-12, 2021 in Boston.

Questions about any of this? Contact us at Assembly@AOPAnet.org or (571) 431-0876.

Thank You to AOPA's National Assembly Sponsors!

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CGS Announces Reviews for L1833 and L1851 - Update

CGS and Noridian have announced that they will be conducting widespread post-payment reviews for two knee orthoses:

L1833- Knee orthosis, adjustable knee joints (unicentric or polycentric), positional orthosis, rigid support, prefabricated, off-the shelf

L1851- Knee orthosis (ko), single upright, thigh and calf, with adjustable flexion and extension joint (unicentric or polycentric), medial-lateral and rotation control, with or without varus/valgus adjustment, prefabricated, off-the-shelf

These two braces were selected for post payment review based on internal data analysis and CERT audit results.

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

DME MACs Clarify AFO/KAFO Policy Article Language Regarding Custom Fabricated Orthoses

The DME MACs have recently clarified language in the AFO/KAFO Policy Article that currently states the following:

MISCELLANEOUS

In addition, if the item is custom fabricated, a complete and clear description of the item, including what makes this item unique, and a breakdown of charges (material and labor used in fabrication). This information should be entered in the narrative field of an electronic claim.

Previous versions of the Policy Article contained the same language but also included contextual language that clearly indicated that the additional requirements only applied to services described by unlisted procedure codes for lower limb orthoses (L2999).

AOPA asked the DME MACs to clarify that the current language is **NOT** intended to apply to all custom fabricated AFO/KAFO codes and that the contextual reference to unlisted codes that was present in previous versions of the Policy Article was an inadvertent omission.

The DME MACs have confirmed that there has been no change to the documentation requirements for custom fabricated AFOs/KAFOs and that the additional information referenced in the Policy Article is only required when submitting unlisted codes. They

indicated that they will clarify this further in a future revision to the AFO/KAFO Policy Article.

CGS Post Payment Review for L0650 Announcement

In July, we informed you that the Centers for Medicare and Medicaid Services (CMS) announced the resumption of certain audit activity beginning on August 3, 2020. CMS clarified that they will not be restarting all audits on August 3, but instead due to the continued Public Health Emergency (PHE) will be implementing a phased approach to allow suppliers time to prepare and adjust.

The audits will begin with limited Durable Medical Equipment Medicare Administrative Contractor (DME MAC) based post-payment reviews and will only involve claims with dates of service prior to the beginning of the declared PHE on March 1, 2020.

CGS, the DME MAC for Jurisdictions B & C, [has just announced](#) that they will be conducting a complex post-payment review for L0650, an off-the-shelf LSO. The review will be for claims with dates of service prior to March 1, 2020. If you receive additional documentation requests as part of this review be sure to respond to them, however be advised that CMS has implied that the DME MACs may allow for flexibility with extensions and the cancelling of audits based on individual supplier's ability to complete the audit.

As of now, there is not a timeframe for when the Target, Probe, and Educate (TPE) program, and other audits will resume. AOPA will continue to monitor the resumption of CMS audit activity and provide you with timely updates.

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

Prior Authorization Requests for Michigan, Pennsylvania, Texas and California

The DME MACs will begin to accept prior authorization requests (PAR) for codes L5856, L5857, L5858, L5973, L5980 and L5987 for all beneficiaries in California, Michigan, Pennsylvania, and Texas on August 18, 2020 for items delivered on or after September 1, 2020. This early submission date is to allow for the 10-day processing time for all PARs.

Here is quick recap of the prior authorization process:

- Complete your DME MAC's prior authorization request (PAR) coversheet for LLP
- Submit the coversheet and all supporting documentation (the SWO and any additional records to support medical necessity) for review. Submissions may be done by fax, mail, or DME MAC web portals.
- Receive either an affirmative or non-affirmative decision and a unique tracking number (UTN).

- If you received a non-affirmative PAR, you may attempt to fix any errors and resubmit your PAR.

If you received an affirmative PAR, you may submit your complete claim for payment and be sure to include your UTN on the claim.

CMS Delays Mandatory Use of Revised ABN Form

The Center for Medicare and Medicaid Services (CMS) has announced that mandatory use of the revised ABN (CMS-R-131 exp. 6/30/2023) form will now be January 1, 2021.

In late June CMS released the new and revised CMS-R-131, the ABN form with an expiration date of 6/30/2023, for immediate use. Mandatory use of the new form was to begin on August 31, 2020, but now will be January 1, 2021.

Suppliers can continue using the ABN form with the expiration date of 03/2020, or they may use the revised form.

The new ABN form with instructions may be found [here](#).

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

Update on CMS Resumption of Medicare Audits

On July 10, [we informed you](#) that the Centers for Medicare and Medicaid Services (CMS) announced the resumption of certain audit activity beginning on August 3, 2020.

AOPA, through its involvement on the DME MAC Advisory Councils has since learned that CMS has clarified the scope of the audits that will resume on August 3. CMS will not be restarting all audits on August 3, but instead due to the continued Public Health Emergency (PHE) will be implementing a phased approach to allow suppliers time to prepare and adjust. The audits will begin with limited DME MAC based post-payment reviews and will only involve claims with dates of service prior to the beginning of the declared PHE on March 1, 2020.

As of now CMS did not provide a timeframe for the next phase or for the renewal of audit activity through the Target, Probe, and Educate (TPE) program, RAC audits or SMRC audits. CMS also reiterated that the DME MACs may allow for flexibility with extensions and the cancelling of audits based on individual supplier's ability to complete the audit.

AOPA will continue to monitor the resumption of CMS audit activity and provide you with timely updates.

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

Correct Coding Reminder for Scoliosis Braces

The Durable Medical Equipment Medicare Administrative Contractors (DME MACs) and the Pricing, Data Analysis and Coding (PDAC) contractor just released a correct coding reminder for five base codes used to describe scoliosis braces: L1000, L1005, L1200, L1300 and L1310.

The L1005 (tension-based scoliosis and accessory pads), L1300 (other scoliosis procedure, body jacket molded to patient model) and L1310 (other scoliosis procedure, post-operative body jacket) are considered to be complete devices and all inclusive. The use of any other addition codes will be considered unbundling and incorrect coding.

The L1000 (CTLSO, Milwaukee, inclusive of furnishing initial orthosis) is a custom fabricated scoliosis brace and the following addition codes may be incorporated into the brace and are eligible for separate payment: L1010, L1020, L1025, L1030, L1040, L1050, L1060, L1070, L1080, L1085, L1090, L1100, L1110, and L1120. The listed addition codes will also be denied as not separately payable if billed with a base code other than the L1000.

The L1200 (TLSO, inclusive of furnishing initial orthosis only) may have the following addition codes incorporated into the brace and are eligible for separate payment: L1210, L1220, L1230, L1240, L1250, L1260, L1270, L1280, and L1290. The listed addition codes will also be denied as not separately payable if billed with a base code other than the L1200.

A copy of the full correct coding reminder may be found [here](#).

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

Calling all AOPA Members, You Now Have FREE Access to AOPAversity

AOPA knows you and your employees are being tremendously impacted by COVID-19. To help, we are offering you, our AOPA members, the ability to access our online learning management system, AOPAversity, for **FREE** for the rest of 2020. It is our hope that this will make it easier to navigate the current unprecedented situation.

What does this mean? You and your employees can now access all 72 online offerings which are pre-recorded videos available on demand. That's 33 business offerings worth 34.5 Business Credits and 39 clinical offerings worth 60.5 Scientific Credits. **FREE.**

If you do not currently have an AOPAversity account, click [here](#) to create a profile. You will need your AOPA member ID and zip code affiliated with your membership when you create

your profile to access the free offering. If you already have an AOPAiversity account, log in [here](#). Your username is the e-mail used to create your profile.

This offer is valid through December 31, 2020. It does exclude any refunds to purchases made prior to the start of this offer. We truly hope this offers you additional support during this uncertain time.

Upcoming Events	
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October 16, 2020	<i>Co-OP Tutorial</i> Learn more and register
November 9 and 10, 2020	<i>Virtual Coding and Billing Seminar</i> AOPA Seminar Learn more and register
November 11, 2020	<i>RAC Audits: What Are They Looking At?</i> AOPA Webinar Learn more and register
November 13, 2020	<i>Co-OP Tutorial</i> Learn more and register