

Documentation Requirements Simplification Project



*Special Open Door Forum
Proposed Changes to
DMEPOS Quality Standards
for Therapeutic Shoe Inserts*

*Melanie Combs-Dyer
Tuesday November 28, 2017
2:00pm to 3:00 pm EST*

Selection of Topics

CMS Administrator Seema Verma's charge:

- Simplify our requirements**
- Make them easier to understand**
- Get rid of requirements we no longer need**
- Challenge the way we have always done things**
- Make sure we have input from external stakeholders**

Agenda

1. Background
2. Recent Activity and Innovation
3. Current Language
4. Proposed Language
5. Consultation Period
6. Payment Method
7. Next Steps
8. Questions?

Background

- Published in October, 2008
 - Durable Medical Equipment, Prosthetics, Orthotics, and Supplies (DMEPOS) Quality Standards
- Appendix C Definitions
 - #1: Custom Fabricated
 - #12: Inserts

Recent Activity and Innovation

- Current standards
 - Requires use of physical model of the foot for molded to patient model method
- Technological changes
 - Eliminates the need for a physical model
 - Directly carved
 - Patient-specific, rectified electronic model
- Not accounted for in the Quality Standards

Current Language

- #1 – Custom Fabricated
 - Individually made for a specific patient
 - Fabricated using calculations, templates, etc.
 - Substantial work to create
- #12 – Inserts
 - Directly molded to the patient's foot or
 - A model of the patient's foot

Proposed Language

- #1 – Custom Fabricated
 - Molded-to-Patient Model
 - Positive Model of the Patient
 - Computer-Aided Design, Computer-Aided Manufacturing Software and Inserts
- *Re-numbered* as #10 – Inserts
 - Patient-specific, rectified electronic model

Consultation Period

§1834(a)(20)(E) “... *consultation with representatives of relevant parties.*”

1. Special Open Door Forum
2. 30 day consultation period
 - Begins: 11/09/2017
 - Ends: 12/11/2017
 - Final decision regarding Quality Standards posted before January 1, 2018

Send Comments to:

ReducingProviderBurden@cms.hhs.gov

Payment Method

Payment for Inserts

- §§1833(o)(2)(A) and 1834(h) mandate fee schedule amounts for inserts be based on historic average reasonable charges increased by annual covered item update factors
- Anticipated value: \$38.67

Next Steps

1. Review and Submit Comments NLT
12/11/2017

ReducingProviderBurden@cms.hhs.gov

2. FINAL decision regarding Quality
Standards posted before
January 1, 2018

Questions

Questions?