

# **Power Mobility Device (PMD) Demonstration Operational Guide**

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The purpose of the PMD Demonstration Operational Guide is to interpret and clarify the documentation responsibilities for Medicare participating suppliers and providers when ordering a PMD for Medicare beneficiaries. These guidelines are merely to assist and explain the documentation requirements that are set forth in CMS National Coverage Policy (CMS Pub. 100-3, Medicare National Coverage Determinations NCD) Manual, Chapter 1, Section 280.3) and the Local Coverage Determination (LCD) Policy (<http://www.cms.gov/Medicare/Coverage/DeterminationProcess/LCDs.html>).

# Chapter 1: Power Mobility Device (PMD) Benefit

For any item to be covered by Medicare it must:

- Be eligible for a defined Medicare benefit category,
- Be reasonable and necessary for the diagnosis or treatment of illness or injury or to improve the functioning of a malformed body member, and
- Meet all other applicable Medicare statutory and regulatory requirements.

The Local Coverage Determination (LCD) policy for each jurisdiction describes in further detail the circumstance under which a PMD will be covered by Medicare.

Medicare covers scooters and power wheelchairs (collectively called PMDs) when:

- A. It is needed by the beneficiary to perform activities of daily living in the home
- B. Other devices (canes, walkers, manual wheelchairs) are not sufficient

Complete coverage and documentation requirements are outlined in the following policies:

- National Coverage Determination (NCD) for PMD
- LCDs for PMD
  - Jurisdiction A LCD Demonstration States: NY, MD, NJ, & PA
  - Jurisdiction B LCD IL, MI, IN, KY, & OH
  - Jurisdiction C LCD FL, NC, TX, GA, TN, & LA
  - Jurisdiction D LCD CA, MO, WA, & AZ
  - CMS MLN Matters Article provides further guidance and clarification about documentation for physicians and treating practitioners when ordering PMDs

## **Chapter 2: Healthcare Common Procedure Coding System (HCPCS) Codes Subject to the Prior Authorization Demonstration**

### **A. PMD Base HCPCS Codes**

The following PMD base HCPCS codes are subject to prior authorization under the demonstration:

- All power operated vehicles (K0800-K0802 and K0812)
- All standard power wheelchairs (K0813-K0829)
- All Group 2 complex rehabilitative power wheelchairs (K0835-K0843)
- All group 3 complex rehabilitative power wheelchairs without power options (K0848-K0855)
- All pediatric power wheelchairs (K0890-K0891)
- Miscellaneous power wheelchairs (K0898)

Note: Group 3 complex rehabilitative power wheelchairs with power options (K0856 thru K0864 are excluded.

### **B. PMD Accessories**

- Under the demonstration, all documentation to support a prior authorization request must meet all applicable rules, policy, and NCD/LCD requirements. The LCD states that for certain bases, the coverage criteria for certain accessories/options must be met to meet coverage criteria for the base. Therefore, when requesting prior authorization for those chair bases with power options (detailed in the LCD) the appropriate supporting documentation as outlined in the LCD to support the base should also be submitted as part of the prior authorization request.

### **C. Prior Authorization request received for a code not listed in Section A**

- No prior authorization decisions will be made on any code NOT on this list. If a DME MAC receives a prior authorization request for a code not on this list, the DME MAC will not review the request and will not issue a decision letter.

## Chapter 3: Demonstration Overview

### A. Who

The physician or treating practitioner or suppliers may submit the Prior Authorization request.

### B. Where

On September 1, 2012 the demonstration initially began in the following 7 states: California, Florida, Illinois, Michigan, New York, North Carolina and Texas. Based on the demonstration's success in bringing down spending and improper payments, and the support received by various stakeholders CMS expanded the demonstration to other high expenditure PMD states.

On October 1, 2014 CMS expanded the demonstration to the following states: Pennsylvania, Ohio, Louisiana, Missouri, Maryland, New Jersey, Indiana, Kentucky, Georgia, Tennessee, Washington and Arizona.

The demonstration requirements will be applied to claims submitted for beneficiaries whose state of residence as reported to the Social Security Administration is within the states subject to the prior authorization demonstration.

If a beneficiary needs to update the address on file at Social Security, the beneficiary can:

- Go online: <https://secure.ssa.gov/apps6z/ICOA/coa001.jsp>
- Call at 1-800-772-1213 (TTY 1-800-325-0778) between 7 a.m. to 7 p.m., Monday through Friday.
- Contact the local Social Security office
- What the beneficiary will need:
  - Complete new address, including zip code.
  - Provide a new phone number or a number to be contacted at.

### C. When

Physicians and suppliers are encouraged to utilize the prior authorization process for all PA eligible PMDs when the 7-element order is signed on or after the demonstration implementation date(s) announced by CMS. The initial demonstration was implemented on September 1, 2012 and the expanded demonstration was implemented on October 1, 2014. Suppliers should place the unique tracking number (UTN) on claims submitted for these PMDs. DME MACs will ramp up reviews of claims submitted without the UTN based on date of service.

The demonstration will end for PMDs August 31, 2018. Additional information will be forthcoming prior to the end of the demonstration as to when the last prior authorization request or resubmission with a 7 element order can be submitted to the DME MAC for review.

### Demonstration Exemption

When there is a representative payee the claims associated with these beneficiaries shall be excluded from the requirements of this demonstration. If the PMD item is eligible for Advance Determination of Medicare Coverage (ADMC), the supplier or beneficiary may submit a request for ADMC.

## Chapter 4: Documentation Requirements

### A. The face-to-face examination documentation

#### 1. Content that should be included in the progress note documenting the face-to-face examination.

See the [MLN Checklist](#) and LCD for PMDs for more details about what a provider needs to include in this documentation.

- [Jurisdiction A LCD \(for beneficiaries residing in NY, MD, NJ, & PA\)](#)
- [Jurisdiction B LCD \(for beneficiaries residing in IL, MI, IN, KY, & OH\)](#)
- [Jurisdiction C LCD \(for beneficiaries residing in FL, NC, GA, TN, & LA\)](#)
- [Jurisdiction D LCD \(for beneficiaries residing in CA, MO, WA, & AZ\)](#)

#### 2. Tools/interfaces that assist physicians or treating practitioners in documenting a progress note.

See Appendix G for definitions and guidelines about tools/interfaces that assist in documenting a progress note.

Physicians/practitioners may also wish to keep in mind that CMS is exploring the development of a Suggested Electronic Clinical Template that would allow electronic health record vendors to create prompts to assist physicians when documenting the Power Mobility Device (PMD) face-to-face encounter for Medicare purposes. The template is available in the Download section of [PMD Electronic Clinical Template](#).

#### 3. Amendments, Corrections, Addenda and Late Entries to Progress Notes, Orders and Other Medical Documentation.

See Appendix F for a description of how to review documents that contain amendments, corrections, addenda and late entries to progress notes, orders and other medical documentation and failure to comply with recordkeeping principles.

### B. 7 element order

1. Beneficiary's name
2. Description of the item that is ordered. This may be general – e.g. “power operated vehicle”, “power wheelchair”, or “power mobility device” – or may be more specific
3. Date of face-to-face examination
4. Pertinent diagnoses/conditions that relate to the need for the POV or power wheelchair
5. Length of need
6. Physician's or treating practitioner's signature
7. Date of physician or treating practitioner signature

### C. Detailed product description

- Must be prepared by the supplier based on the physician's or treating practitioner's 7 element order and reviewed, signed and dated by the physician or treating practitioner ;



- Specific Healthcare Common Procedure Coding System (HCPCS) code for base and any options and accessories required to meet coverage criteria for the base; or a narrative description of the items or manufacturer name and model name/number. Regardless of the form of the description, there must be sufficient detail to identify the item(s) in order to determine that the item(s) dispensed is properly coded;
- Physician or treating practitioner signature and date signed; and
- Date stamp or equivalent to document receipt date.

**D. Other Relevant Documentation if necessary**

## Chapter 5: Submitting a Request

### A. Submitters are encouraged to include the following data elements in all Prior Authorization (PA) request package to avoid potential delays in processing:

#### Beneficiary Information (as written on their Medicare card)

- Beneficiary Name,
- Beneficiary Medicare Number (also known as HICN), and
- Beneficiary Date of Birth

#### Physician/Practitioner Information

- Physician/Practitioner Name,
- Physician/Practitioner National Provider Identifier (NPI), and
- Physician/Practitioner Address

#### Supplier Information

- Supplier Name,
- Supplier NSC Number,
- Supplier NPI, and
- Supplier Address

#### Other Information

- HCPCS Code,
- Submission Date, and
- Indicate if the request is an initial or subsequent review

Submitters should note that the **beneficiary and supplier** addresses listed in the PA Request **will not** be used by the DME MACs when sending review decision letters. The decision letters for suppliers and beneficiaries will be mailed to the supplier address on file with the National Supplier Clearinghouse and the beneficiary address on file with the Social Security Administration. However, the **physician/practitioner** address listed in the PA Request **will** be used by the DME MACs when sending review decision letters.

### B. Prior Authorization Cover Sheets:

Submitters should also note that CMS has not mandated a cover sheet for submitters to use. However, the following DME MACs have created OPTIONAL cover sheets for submitters who wish to use them:

- [Jurisdiction A cover sheet \(for beneficiaries residing in NY,MD, NJ, & PA\)](#)
- [Jurisdiction B cover sheet \(for beneficiaries residing in IL, MI, IN, KY, & OH\)](#)
- [Jurisdiction C cover sheet \(for beneficiaries residing in FL, NC, TX, GA, TN, & LA\)](#)
- [JD cover sheet \(for beneficiaries residing in CA,MO, WA, & AZ\)](#)

### C. Include the following documentation in a PA request package

1. Face-to-face documentation
2. 7-element order
3. Detailed Product Description

4. Evidence of Rehabilitation Engineering Society of North America (RESNA) certified Assistive Technology Professional (ATP) involvement, if applicable
5. Licensed Certified Medical Professional (LCMP) supplier financial attestation statement, if applicable
6. Specialty Evaluation, if applicable
7. Information from the beneficiary's medical record demonstrating that the applicable coverage requirements have been met.

**D. Methods for sending a PA request package**

Submitters have the following options for submitting PA requests to the DME MACs: 1) mail, 2) fax, 3) electronic submission of medical documentation (esMD), 4) internet based provider portals (DME MAC specific).

Jurisdictions A, B, C and D are accepting PA requests via esMD.

For more information about esMD, see [www.cms.gov/esMD](http://www.cms.gov/esMD) or contact your DME MAC.

See below for addresses and fax numbers of the DME MACs.

- For beneficiaries residing in Jurisdiction A demonstration states send requests to:
  - Fax Number: 781-383-4519
  - Street Address: NHIC  
75 Sgt William B. Terry Drive  
Hingham, MA 02043
  - esMD: (indicate document type "8")
  
- For beneficiaries residing in Jurisdiction B demonstration states send requests to DME:
  - Fax Number: 317-841-4414
  - Street Address: Medical Review-PMD Prior Authorization Request  
P.O. Box 7018  
Indianapolis, IN 46207-7018
  - esMD: (indicate document type "8")
  
- For beneficiaries residing in Jurisdiction C demonstration states send requests to :
  - Fax Number: 615-664-5960
  - Street Address: CGS-DME Medical Review-Prior Authorization  
P.O. Box 24890  
Nashville, TN 37202-4890
  - esMD: (indicate document type "8")
  
- For beneficiaries residing in Jurisdiction D demonstration states send request to:
  - Fax Number: 701-277-7891
  - Street Address: Noridian Healthcare Solutions  
P.O. Box 6742

Fargo, ND 58108-6742

- esMD: (indicate document type “8”)

## E. General Process

### 1. Possible Outcomes of Review.

The DME MAC will review the request and either:

- Affirm the request (Chapter 6) or
- Non-affirm the request (Chapter 7)
  - Incomplete request

### 2. Cases where Medicare is primary and another insurance company is secondary.

Suppliers may submit the claim without a prior authorization decision if the claim is for a denial of not medically necessary (GA modifier), non-covered (GY modifier), or no 7-element order (EY and GA modifier). A prior authorization is not needed and the claim will not be developed due to the prior authorization demonstration.

If a supplier chooses to use the prior authorization for a denial then the following process is to be followed:

- The submitter may submit the **prior authorization request** with complete documentation as appropriate. If all relevant Medicare coverage requirements are **not** met for the PMD, then a non-affirmative prior authorization decision will be sent to the physician or treating practitioner, supplier and beneficiary advising them that Medicare will not pay for the item.
- After receiving a non-affirmative decision for the prior authorization request, and a **claim** is submitted by the supplier to the DME MAC for payment it will be denied.
- The submitter or beneficiary may forward the denied claim to his/her secondary insurance payer as appropriate to determine payment for the PMD.

### 3. Cases where another insurance company is primary and Medicare is secondary.

If a supplier plans to bill another insurance first and bill Medicare second, the submitter and beneficiary have 2 options:

#### a. Seek Prior Authorization

- The submitter submits the **prior authorization request** with complete documentation as appropriate. If all relevant Medicare coverage requirements **are** met for the PMD, then an affirmative prior authorization decision will be sent to the physician or treating practitioner, supplier and beneficiary advising them that Medicare **will** pay for the item.
- The supplier delivers the item and submits a **claim** to the **other insurance company**.
- If the other insurance company denies the claim, the supplier can submit a claim to the DME MAC (listing the PA UTN on the claim). The DME MAC will pay the claim.

**b. Skip Prior Authorization**

- Deliver the item. Submit a claim to the primary payer for a determination as appropriate.
- DME MAC will stop claim for review. DME MAC will send an additional documentation request (ADR) letter. Supplier should respond to the ADR.

**4. Timeframe for Decisions.**

The DME MAC will postmark notification of the decision to the physician or treating practitioner, supplier, and beneficiary within 10 business days for an initial request. For resubmitted requests the DME MAC will postmark notification of the decision to the physician or treating practitioner, supplier and beneficiary within 20 business days.

**5. Physicians or Treating Practitioners Telephone Inquires**

- Physicians or treating practitioners and suppliers who have questions about the PMD prior authorization process should call the appropriate DME MAC. The numbers for Customer Service Representatives at the DME MACs are as follows
  - For beneficiaries residing in Jurisdiction A demonstration states call 1-866-590-6731; TTY/TDD 1-888-897-7539.
  - For beneficiaries residing in Jurisdiction B demonstration states call 1-866-590-6727; TTY/TDD 1-888-897-7534.
  - For beneficiaries residing in Jurisdiction C demonstration states call 1-866-270-4909; TTY/TDD 1-888-204-3771.
  - For beneficiaries residing in Jurisdiction D demonstration states call 1-877-320-0390; TTY/TDD 1-866-879-2704.

**See Appendices A-E**

## Chapter 6: An Affirmative Request

### A. Decision Letter (s)

The DME MAC will send decision letters with the affirmative UTN to the physician or treating practitioner, supplier and beneficiary via esMD or mail postmarked within 10 business days for initial requests and 20 business days for resubmitted requests.

### B. Transferability of an Affirmative PA Decision

An affirmative PA decision follows the beneficiary. It is the beneficiary's choice as to which supplier will deliver the PMD and bill Medicare.

### C. Supplier's Actions

- Ensure that home assessment is complete.
- Deliver the item to beneficiary.
- Document proof of delivery.
- Obtain beneficiary's authorization.
- Have all documentation available on request.
- Submit the claim ensuring the UTN is properly attached.
  - The submission of the prior authorized PMD claim is to have the 14 byte UTN that is located on the decision letter. For submission of a claim, the UTN is submitted in Item 23 of the 1500 Claim Form. For electronic claims the UTN is submitted at either loop 2300 REF02 (REF01 = G1) or loop 2400 REF02 (REF01 = G1).
- If all requirements are met the claim will be paid.
- The prior authorization demonstration has specific parameters for pre-payment review; however other contractors (CERT, ZPICs, RACs, etc.) may have parameters outside of the PA demonstration that will suspend the same claim for another type of review. If your claim is selected for review, guidance and directions will be provided on the Additional Documentation Request Letter from the requesting contractor.

**See Appendix B: Request Process for PMD (Supplier Submits)**

## Chapter 7: A Non-Affirmative Request

**An incomplete request is considered non-affirmed. When an incomplete request is submitted:**

- The DME MAC will provide a non-affirmed detailed determination letter along with the non-affirmative (UTN to the physician or treating practitioner, supplier and beneficiary via esMD, or mail postmarked within 10 business days for initial requests and 20 business days for resubmitted requests. Another complete request package including all of the required documentation pertinent for the requested PMD as outlined in Chapter 4 and Local Coverage Determination (LCD) Policy for PMDs as well as the necessary medical documentation/coverage criteria missing from the previous request detailed in the decision letter.
  - See Chapter 8 for instructions on resubmitting a PA request.
  - See Appendix F for CMS' guidance on Amendments, Corrections, Addenda and Late Entries in Medical Documentation
  - Please be mindful of the required date sequence for the pertinent documentation as outlined in the LCD for PMDs.
  
- If the claim is submitted by the supplier to the DME MAC for payment with a non-affirmative prior authorization decision, it will be denied.
  - All appeal rights are then engaged.
  - This claim could then be submitted to secondary insurance.

### **Clerical Error**

If a DME MAC verifies that a clerical error was made by the review staff when reviewing the PA request and the decision was non-affirmative as a result of this error, the DME MAC has the sole discretion to determine whether to change the decision to affirmative. The clerical error in question must be present and legible in the documentation already in the DME MAC's possession. If not, the supplier must resubmit the PA request for a subsequent review and decision (e.g. the date of the face to face examination was overlooked in the PA request package and the supplier contacted the DME MAC to inform them this information is present in the PA request package. Based on this information the DME MAC reviewed the PA request and confirmed the clerical error. The information was present and legible in the PA request as stated by the supplier. In this instance the DME MAC may change the decision and send an affirmed decision to the supplier).

### **Physicians or Treating Practitioners Actions:**

- Use the detailed decision letter to ensure that the resubmitted request package complies with all requirements.
  - Resubmit a complete prior authorization request package, if appropriate.

**Suppliers Actions:**

- Use the detailed decision letter to ensure that the resubmitted request package complies with all requirements.
  - Resubmit a complete prior authorization request package, if appropriate.
  
- Submit the claim (with the UTN properly attached) for a denial.
  - All appeal rights are then engaged.
  - This claim could then be submitted to secondary insurance.



## **Chapter 8: Resubmitting a Prior Authorization Request**

- The, submitter should review the detailed decision letter that was received as a result of the previous request.
- The submitter should make whatever modifications are needed to the prior authorization package based on the details included in the non-affirmed decision letter and is encouraged to resubmit a complete prior authorization package for subsequent review.
- The DME MAC will provide notification of the decision through a detailed decision letter postmarked within 20 business days of receipt to the physician or treating practitioner, supplier and beneficiary.

## Chapter 9: Claim Submission Where PA was Sought

### A. Cases Where a PA Request was Submitted and Affirmed

- The submission of the prior authorized PMD claim must contain the 14 byte UTN that is located on the PA decision letter. For submission of a claim, the UTN must be submitted in Item 23 of the 1500 Claim Form. For electronic claims the UTN must be submitted at either loop 2300 REF02 (REF01 = G1) or loop 2400 REF02 (REF01 = G1).

### B. Cases Where a PA Request was submitted and Non-Affirmed.

- The submission of the prior authorized PMD claim must contain the 14 byte UTN that is located on the PA decision letter. For submission of a claim, the UTN must be submitted in Item 23 of the 1500 Claim Form. For electronic claims the UTN must be submitted at either loop 2300 REF02 (REF01 = G1) or loop 2400 REF02 (REF01 = G1).

### C. Beneficiary Moving During a Rental Series of Claims

- **Series of claims:**
  - Should be submitted with the UTN properly attached on the claim.
  - Should be submitted to the applicable DME MAC for adjudication

#### Scenarios:

#### Beneficiary moves from a PA demonstration state to a different PA demonstration state:

- Same Supplier – Same jurisdiction:
  - PA decision follows the beneficiary
  - Supplier continues billing
- Same Supplier – Change jurisdiction:
  - PA decision follows the beneficiary
  - Supplier bills to new jurisdiction
  - New jurisdiction may send ADR letter asking supplier for PA decision letter
- Change Supplier – Same jurisdiction:
  - PA decision follows the beneficiary
  - Supplier must obtain a new DPD in order to continue billing
- Change Supplier – Change jurisdiction:
  - PA decision follows the beneficiary
  - Supplier must obtain a new DPD in order to continue billing
  - Supplier bills to new jurisdiction
  - New jurisdiction may send ADR letter asking supplier for PA decision letter
  - New supplier must comply with all Medicare documentation and claim submission requirements (e.g., number of days between the completion of the face-to-face exam and the delivery, etc.)

Beneficiary moves from a PA demonstration state to a non-demonstration state:

- Same Supplier – Same jurisdiction:
  - PA decision follows the beneficiary
  - Supplier continues billing
- Same Supplier – Change jurisdiction:
  - PA decision follows the beneficiary
  - Supplier bills to new jurisdiction
- Change Supplier – Same jurisdiction:
  - PA decision follows the beneficiary
  - Supplier must obtain a new DPD in order to continue billing
- Change Supplier – Change jurisdiction:
  - PA decision follows the beneficiary
  - Supplier must obtain a new DPD in order to continue billing
  - Supplier bills to new jurisdiction
  - New supplier must comply with all Medicare documentation and claim submission requirements (e.g., number of days between the completion of the face-to-face exam and the delivery, etc.)

**Beneficiary Moving During a Rental Series of Claims**  
**Quick Reference Chart**

	<b>Demo State to Demo State</b>	<b>Demo State to Non-Demo State</b>	<b>Non-Demo State to Demo State</b>
<b>Same Supplier Same Jurisdiction</b>	PA transfers Continue billing	PA transfers Continue billing	No PA required Continue billing
<b>Same Supplier Change Jurisdiction</b>	PA transfers Bill new jurisdiction ADR for decision letter	PA transfers Bill new jurisdiction	No PA required Bill new jurisdiction
<b>Change Supplier Same Jurisdiction</b>	PA transfers New DPD Continue billing	PA transfers New DPD Continue billing	PA required (See Ch. 10)
<b>Change Supplier Change Jurisdiction</b>	PA transfers New DPD Bill new jurisdiction ADR for decision letter	PA transfers New DPD Bill new jurisdiction	PA required (See Ch. 10)

**Note: 25% payment reduction does not apply to scenarios in which a PA was sought**

**See Appendix D-PMD Base Claim Line Process (if PA was sought)**

## **Chapter 10: Claim Submission Where PA was NOT Sought: The Prepayment Review and Payment Reduction Process**

- If an applicable claim is submitted without a PA UTN, it will be stopped for review and a payment reduction may apply. Claims with 7-element orders written before September 1, 2012 are not applicable for the prior authorization demonstration in the following states: California, Florida, Illinois, Michigan, New York, North Carolina and Texas. Additionally, claims with 7-element orders written before October 1, 2014 are not applicable for the prior authorization demonstration in the following states: Pennsylvania, Ohio, Louisiana, Missouri, Maryland, New Jersey, Indiana, Kentucky, Georgia, Tennessee, Washington and Arizona. DME MACs will ramp up reviews of claim submitted without the UTN based on date of service. Once fully ramped up, all initial claims submitted without a UTN will be stopped for review and a payment reduction may apply.
- At this time, suppliers do not need to do anything differently when submitting a claim without a UTN. They do not need to put any information in the remarks field. They do not need to submit any unsolicited documentation.

### **A. Stopping a Claim for Review.**

- The DME MAC will stop the claim and send an ADR through the US Postal Service to the supplier address on file with the National Suppliers Clearinghouse.
  - The supplier will have 45 days to respond to the ADR with all requested documentation.
  - The supplier can send the documentation via:
    - Fax
    - Mail
    - esMD (for more information see: [www.cms.gov/esMD](http://www.cms.gov/esMD))
    - Internet based provider portal
- The DME MAC will review the claim.

### **B. Payment Reduction May Apply.**

- If the claim is payable the DME MAC will determine if the supplier is a competitive bid supplier.
  - If yes, the claim (and the remainder of the series) will be paid at the single payment amount.
  - If no, the claim (and the rest of the series) will automatically be assessed a 25 percent reduction of the Medicare payment after co-insurance and deductible. There was a 3-month grace period before

the payment reduction rule applies. Thus, the payment reduction began for 7-element orders written on or after December 1, 2012. The 3-month grace period payment reduction rule will apply to the expanded demonstration claims. The payment reduction began for 7-element orders written on or after January 1, 2015 for the expanded demonstration states.

- This payment reduction is not transferable to the beneficiary.
  - This payment reduction is not appealable.
  - The payment reduction applies only to the base HCPCS codes (e.g., the codes listed in Chapter 2 Section A). The payment reduction does NOT apply to accessories, even if billed on the same claim.
- Suppliers should keep in mind that they can avoid the prepayment review and the possible payment reduction by submitting a PA request.

#### **C. Retroactive Medicare Eligibility**

- Beneficiaries with retroactive Medicare eligibility status may have a Medicare PA request submitted on their behalf to the DME MAC for payment reimbursement due to change in their Medicare status. If a PA request is submitted, the supplier is not subject to the 25 percent payment reduction or prepayment review. However, the supplier seeking reimbursement shall indicate that the PMD has been delivered, that Medicare coverage is retroactive and submit all necessary PA request documentation to support the medical necessity of the item. If a claim is submitted without first going through PA it will be stopped for review.

#### **D. Beneficiary Moving During a Rental Series of Claims (See Quick Reference chart in Ch. 9)**

##### Scenarios:

##### Beneficiary moves from a non-demonstration state to a PA demonstration state:

- Same Supplier – Same jurisdiction:
  - PA not required
  - Supplier continues billing rental series
  - Supplier will receive ADR if billing the first claim in a series

- Same Supplier – Change jurisdiction:
  - PA not required
  - Supplier continues billing rental series
  - Supplier bills to correct jurisdiction
  - Supplier will receive ADR if billing the first claim in a series
  
- Change Supplier – Same jurisdiction:
  - PA required
  
- Change Supplier – Change jurisdiction:
  - PA required

**See Appendix E-PMD Base Claim Line Process (if PA was not sought)**

## Chapter 11: The G-Code

- Physician/Practitioner can bill G9156 after he/she submits an initial Prior Authorization Request.
  - G-code is billed to the A/B MAC contractors with the Prior Authorization UTN.
  - Only one G-code may be billed per beneficiary per PMD even if the physician/practitioners must resubmit the request.
  - Code is not subject to co-insurance and deductible.
  - Physicians may not bill the G-code in instances where the supplier submits the Prior Authorization Request
  - Suppliers may not bill the G-code.
  
- The new G9156 code can be billed IN ADDITION TO:
  - the existing G0372 code that physicians/practitioners can bill to provide additional reimbursement to recognize the additional time and effort that are required to provide documentation to the supplier,
  - the E&M visit code



## Chapter 12: Upgrades

The PMD that meets the medical necessity requirements outlined in the medical policy is what is reported on the Prior Authorization request. The medical records documentation must justify the PMD for which the beneficiary qualifies, not the item that is considered for the upgrade. Once the supplier has determined the specific power mobility device that is appropriate for the patient based on the physician's or treating practitioner's 7-element order, the supplier must prepare a written document (called a "detailed product description" (DPD)). This DPD must comply with the requirements for a detailed written order as outlined in the Supplier Manual and CMS' Program Integrity Manual (Internet-Only Manual, Pub. 100-08) Chapter 5. For example, if a beneficiary meets the coverage criteria for a K0823, the Prior Authorization submitted should be for the K0823 and the medical records documentation would support the K0823. After medical necessity is established for the PA request for a PMD, the process to provide an upgrade may be started.

If in fact, an upgrade is to be provided it is suggested that the supplier note on the DPD that an upgrade is being supplied.

Suppliers may refer to the "Upgrade Billing for Power Mobility Devices" and "Revised-Use of Upgrade Modifiers" articles published on the four DME MAC web pages for further guidance concerning upgrades.

- [DME MAC JA](#)
- [DME MAC JB](#)
- [DME MAC JC](#)
- [DME MAC JD](#)

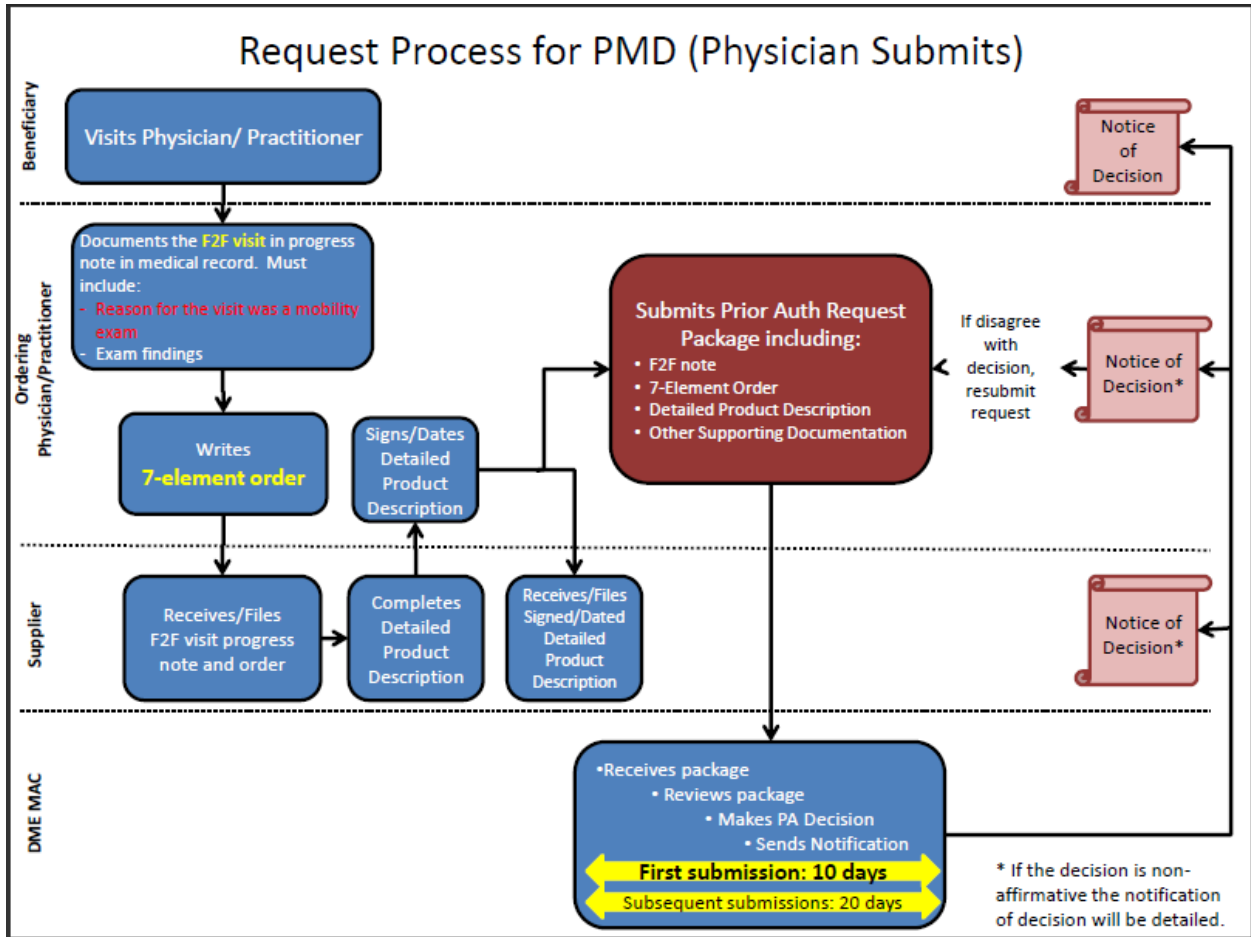
## **Chapter 13: Claim Appeals**

Appeals follow all current procedures. For further information consult the Medicare Claims Processing Manual publication 100-04, chapter 29 Appeals of Claims Decision.

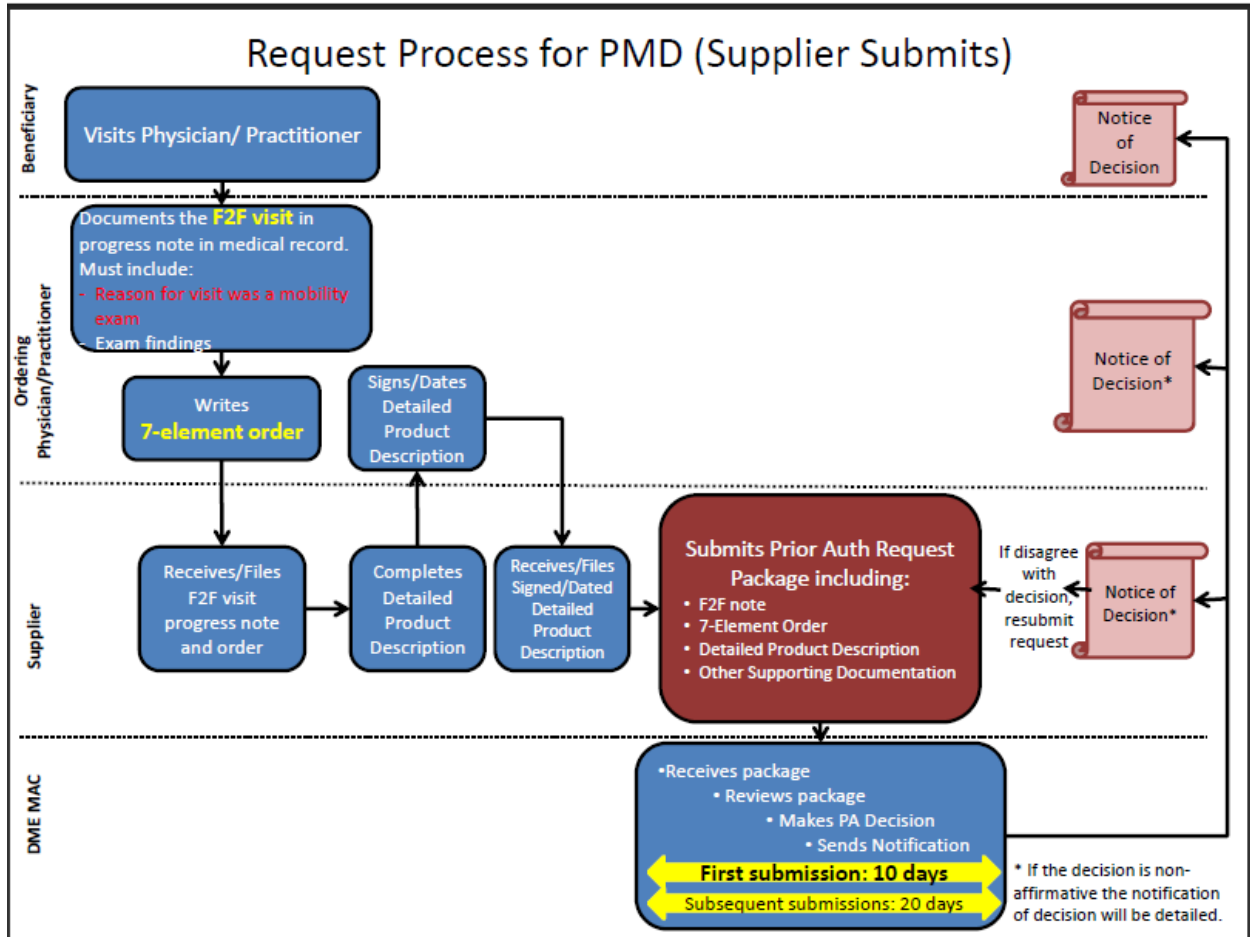
This demonstration does not include a separate appeal process for a non-affirmative prior authorization request decision. However, a non-affirmative prior authorization request decision does not prevent the supplier from submitting a claim. Such a submission of a claim and resulting denial by the DME MAC would constitute an initial determination what would make the appeals process available for Medicare beneficiaries and suppliers disputes.

The 25 percent payment reduction, which applies for failure to receive a prior authorization decision before submission of a claim, is non-transferrable to the beneficiary. This payment reduction is not subject to appeal. It began December 1, 2012 in the original demonstration states, and was implemented January 1, 2015 for the expansion states.

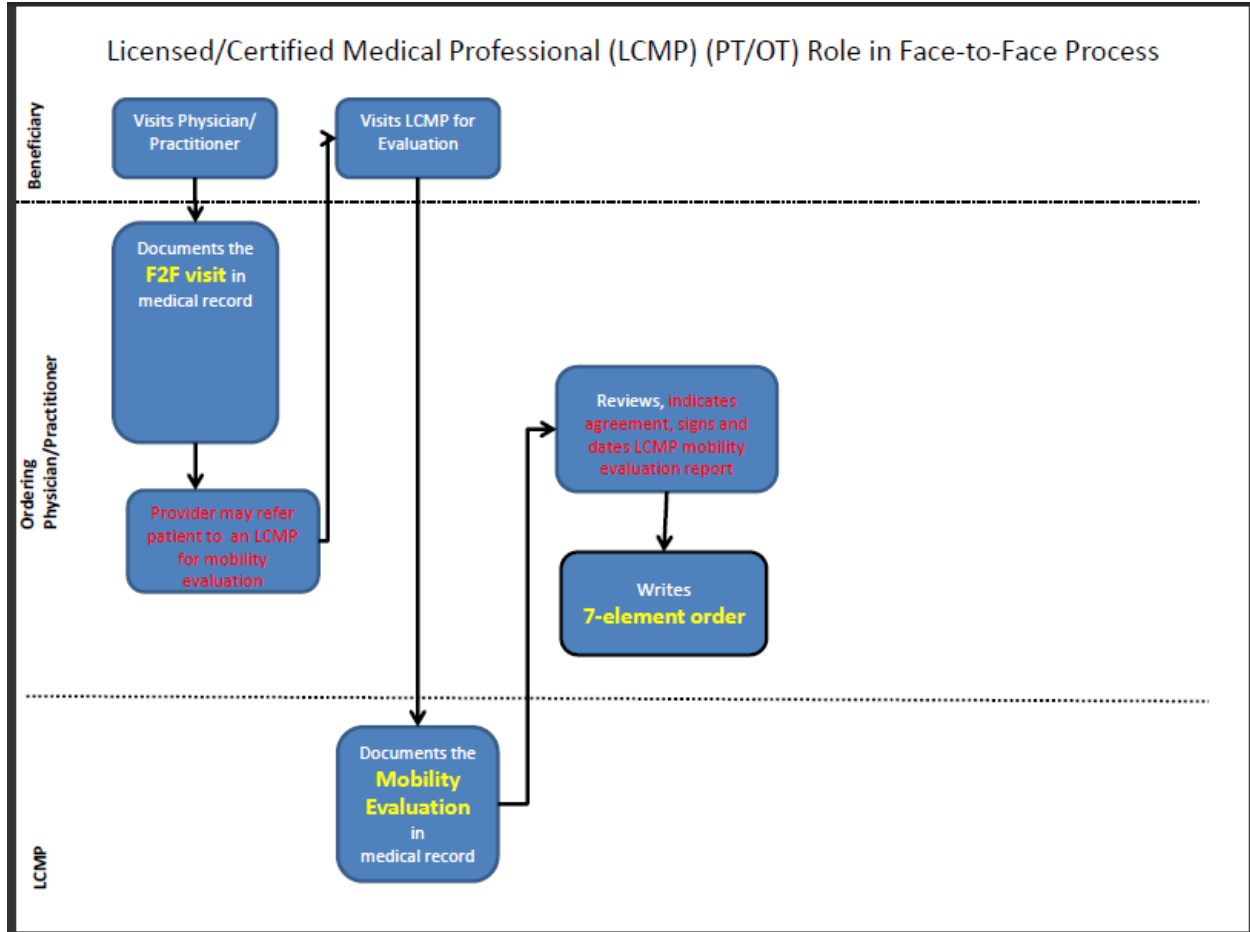
## Appendix A: Request Process for PMD (Physician Submits)



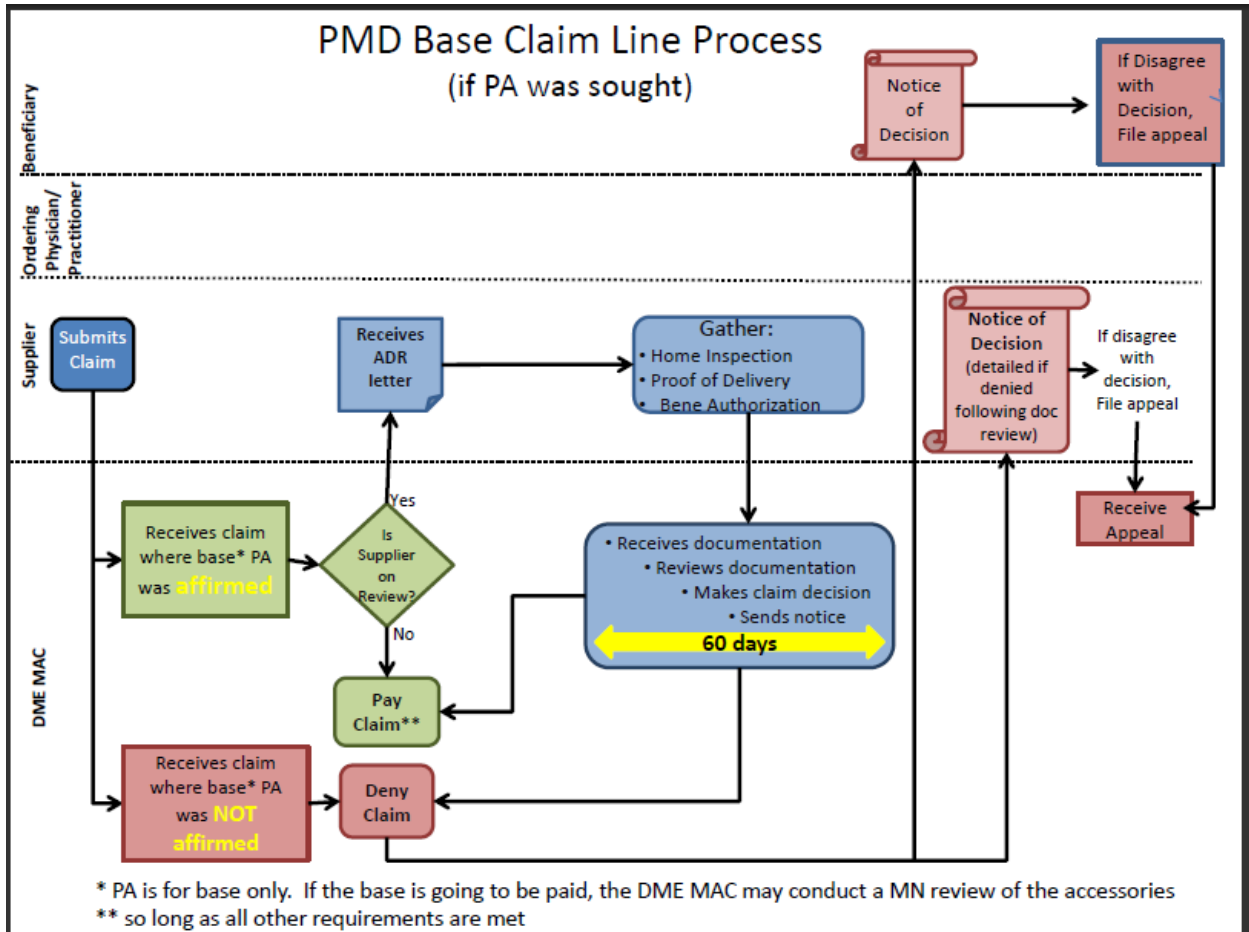
## Appendix B: Request Process for PMD (Supplier Submits)



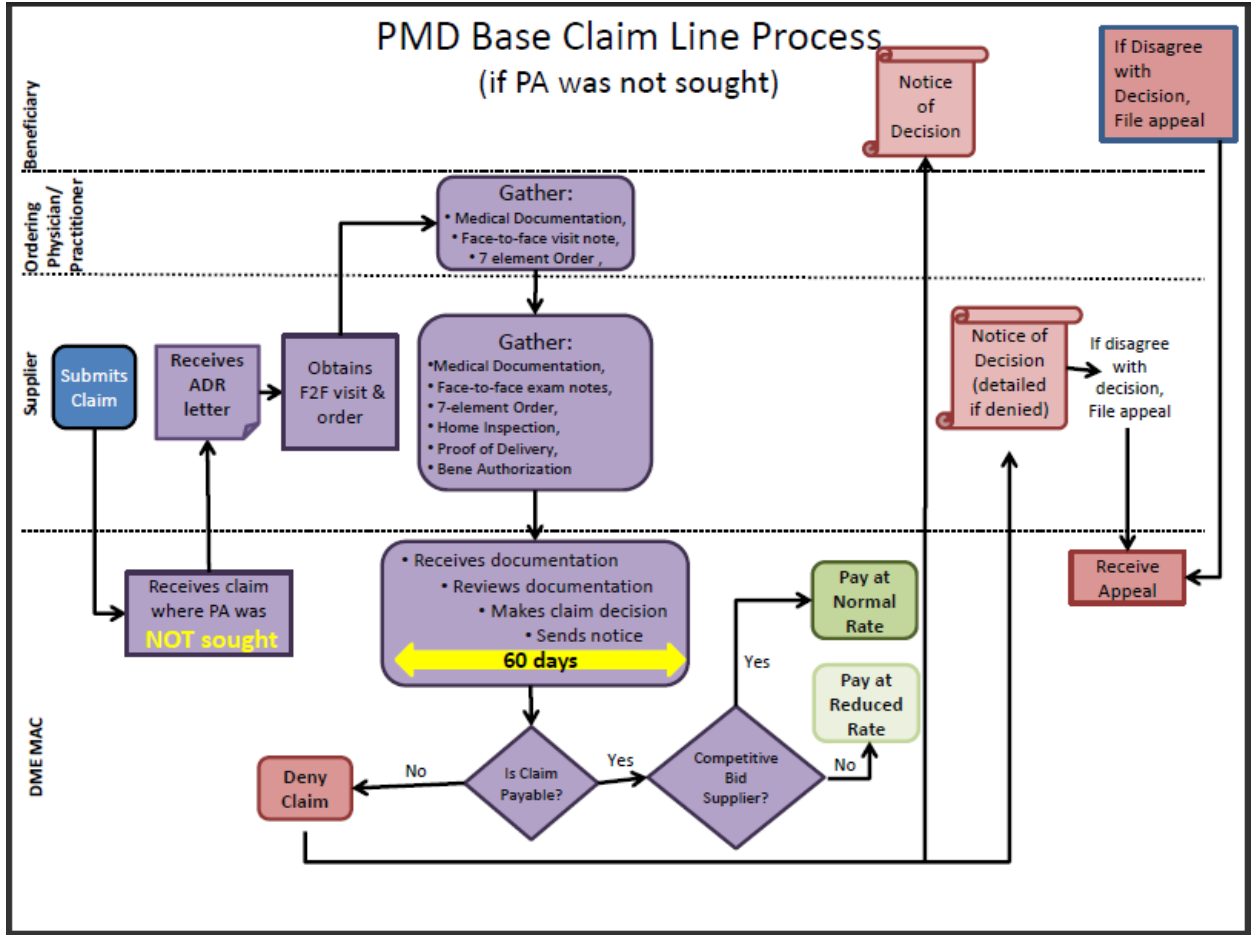
## Appendix C: Licensed/Certified Medical Professional (LCMP) (PT/OT) Role in Face-to-Face Process



## Appendix D: PMD Base Claim Line Process (if PA was sought)



# Appendix E: PMD Base Claim Line Process (if PA was not sought)



## **Appendix F: Amendments, Corrections and Delayed Entries to Progress Notes, Orders and Other Medical Documentation (PIM 3.3.2.5)**

### **A. Amendments, Corrections and Delayed Entries in Medical Documentation**

Providers are encouraged to enter all relevant documents and entries into the medical record at the time they are rendering the service. Occasionally, upon review a provider may discover that certain entries, related to actions that were actually performed at the time of service but not properly documented, need to be amended, corrected, or entered after rendering the service. When making a review determination, the DME MACs shall consider all submitted entries that comply with the widely accepted Recordkeeping Principles described in section B below. The DME MACs shall NOT consider any entries that do not comply with the principles listed in section B below, even if such exclusion would lead to a claim denial. For example, they shall not consider undated or unsigned entries handwritten in the margin of a document. Instead, they shall exclude these entries from consideration.

### **B. Recordkeeping Principles**

Regardless of whether a documentation submission originates from a paper record or an electronic health record, documents submitted to a DME MAC containing amendments, corrections or addenda must:

1. Clearly and permanently identify any amendment, correction or delayed entry as such, and
2. Clearly indicate the date and author of any amendment, correction or delayed entry, and
3. Not delete but instead clearly identify all original content

**Paper Medical Records:** When correcting a paper medical record, these principles are generally accomplished by using a single line strike through so that the original content is still readable. Further, the author of the alteration must sign and date the revision. Similarly, amendments or delayed entries to paper records must be clearly signed and dated upon entry into the record.

**Electronic Health Records (EHR):** Medical record keeping within an EHR deserves special considerations; however, the principles above remain fundamental and necessary for document submission to a DME MAC. Records sourced from electronic systems containing amendments, corrections or delayed entries must:

- a. Distinctly identify any amendment, correction or delayed entry, and
- b. Provide a reliable means to clearly identify the original content, the modified content, and the date and authorship of each modification of the record.



C. If a DME MAC identifies medical documentation with potentially fraudulent entries, the reviewers shall refer the case to the ZPIC and may consider referring to the RO and State Agency.

## Appendix G: Progress Notes and Templates (PIM 3.3.2.5)

### A. Definitions

1. **"Progress Notes"** -- visit notes, encounter notes, Evaluation and Management documentation, office notes, face-to-face evaluation notes or any other type of record of the services provided by a physician or other licensed/certified medical professional (LCMP) in the medical record. Progress notes may be in any form or format, hardcopy or electronic.

2. **"Template"** -- a tool/instrument/interface that assists in documenting a progress note. Templates may be paper or electronic.

3. **"Electronic records"** may involve any type of interface including but not limited to:

- simple electronic documents,
- sophisticated graphical user interfaces (GUIs) with clinical decision and documentation support prompts, or
- electronic pen capture devices.

4. **"Licensed/Certified Medical Professional (LCMP)"** – medical professional licensed or certified to practice in the state in which services are rendered. For the purpose of the documenting DMEPOS items, a physician or LCMP must not have a financial relationship with the DMEPOS supplier.

### B. Guidelines Regarding Which Documents DME MAC Will Consider

The DME MAC shall consider all medical record entries made by physicians and LCMPs. See PIM 3.3.2.5 regarding consideration of Amendments, Corrections and Delayed Entries in Medical Documentation.

The amount of necessary clinical information needed to demonstrate that all coverage and coding requirements are met will vary depending on the item/service. See the Local Coverage Determination for further details.

CMS does not prohibit the use of templates to facilitate record-keeping. CMS also does not endorse or approve any particular templates. A physician/LCMP may choose any template to assist in documenting medical information.

Some templates provide limited options and/or space for the collection of information such as by using "check boxes," predefined answers, limited space to enter information, etc. CMS discourages the use of such templates. Claim review experience shows that that limited space templates often fail to capture sufficient detailed clinical information to demonstrate that all coverage and coding requirements are met.

Physician/LCMPs should be aware that templates designed to gather selected information focused primarily for reimbursement purposes are often insufficient to demonstrate that all coverage and coding requirements are met. This is often because these documents do not provide

sufficient information to adequately demonstrate that the medical necessity criteria for the item/service are met.

If a physician/LCMP chooses to use a template during the patient visit, CMS encourages them to **select one that allows for a full and complete collection of information** to demonstrate that the applicable coverage and coding criteria are met.

CMS recommends that the physician/LCMP document in their usual medical record keeping format.

Certificates of Medical Necessity (CMN), DME Information Forms (DIF), and supplier prepared statements and physician attestations by themselves do **NOT** provide sufficient documentation of medical necessity, even if signed by the ordered physician. These types of documents will **NOT** be considered by the contractor when making a coverage/coding determination. See PIM §5.7 for additional information on documentation.

Supplier-prepared statements and records (even if signed by the ordering physician) and physician attestation letters (e.g. Letters of Medical Necessity), are NOT considered to be part of a medical record for Medicare payment purposes. Review contractors shall NOT consider this type of documentation when making a coverage/coding determination.

### **C. Financial Liability**

The physician/LCMP should be aware that inadequate medical record documentation can lead to a financial liability for the Beneficiary and/or Supplier, should the reviewer determine that the claim is not supported.

In addition, the physician/LCMP should be aware when ordering an item or service that will be furnished by another entity, Section 1842(p)(4) of the Social Security Act requires that adequate documentation supporting medical necessity be provided to the entity at the time that the item or service is ordered. Physicians/LCMPs who fail to submit documentation upon a supplier's request may trigger increased DME MAC review of the physician/LCMP's evaluation and management services.