

CMS-1307-GNC-1 Criteria and Standards for Evaluating Intermediary, Carrier, and Durable Medical Equipment, Prosthetics, Orthotics, and Supplies (DMEPOS) Regional Carrier Performance During Fiscal Year 2006

Submitter : Mr. Curtis Edmonds

Date & Time: 09/30/2005

Organization : New Jersey Protection

Category : Consumer Group

Issue Areas/Comments

GENERAL

GENERAL

See attachment.

DEPARTMENT OF HEALTH AND HUMAN SERVICES
CENTERS FOR MEDICARE AND MEDICAID SERVICES
OFFICE OF STRATEGIC OPERATIONS & REGULATORY AFFAIRS

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Please direct your questions or comments to 1 800 743-3951.

CMS-1307-GNC-2 Criteria and Standards for Evaluating Intermediary, Carrier, and Durable Medical Equipment, Prosthetics, Orthotics, and Supplies (DMEPOS) Regional Carrier Performance During Fiscal Year 2006

Submitter : Mrs. Jane Bahor

Date & Time: 10/10/2005

Organization : Board for Certification in Clinical Anaplastology

Category : Other Practitioner

Issue Areas/Comments

GENERAL

GENERAL

The provision of facial prostheses (ear, ocular, nose , eye, cheek,) and other soft tissue defects including fingers, partial hands, and , soft tissue fillers, has been performed for 50+ years by a variety of technical and clinical personnel. This ruling could make it legally impossible for our practitioners to provide physician prescribed prosthetic devices to our patients.

We would like to insure that our certification be considered as an alternative to BCO and ABC certification in the instance of DME manufacture of aesthetic soft tissue restorations.

All the work performed by Clinical Anplastologists is prescribed by a medical doctor or doctor of dentistry. Their labs and practices are subject to FDA regulation and inspection if they do not work in a hospital setting.

Twenty five years ago an organization was formed to support those practitioners and to improve their communications and education. This group is called the American Anaplastology Association with 175 members from around the world. Although a small field, the group is dedicated and determined to provide quality care to people disfigured by birth, tumor, or trauma and help them back to a more normal and productive life.

We recognize the need for separate certification in order to elevate the quality and control the competency of those practicing in this field. Thus the Board for Certification in Clinical Anaplastology was formed & incorporated to develop a testing program for this purpose. Separate, but in cooperation with the American Anaplastology Association, this certification is currently accepting applications and will begin testing of applicants in 2006. There is a core of experts in the field who are developing the testing in accordance with NOCA standards for test development.

Please consider this small profession in your rulemaking for supplier/provider qualifications.

Don't hesitate to call me: Jane Bahor, 919-684-5228 at Duke University Medical Center or Juan Garcia, 410-955 3213 at Johns Hopikins Universtiy with questions about the field of Anaplastology or the effort to certify Clinical Anplastologists.