

The Supplier's Role

Georgie Blackburn
Rehab Team Leader
DMEMAC "A" Advisory Council

Simple Changes?

- The Medical Record is key
- The Order is key
- Supplier Compliance is affected
- PMD's: Physician Compliance is affected



LCD'S Educate!

- MAE requires Algorithmic approach to documentation in the medical record
- Manual Wheelchairs require specificity within the medical record – what level – why?
- Power Wheelchairs require negation of a scooter as well as manual mobility

Manual MAE's

- Identify one or more MRADL's
- Medical Record must state why a lesser level of MAE is not appropriate or safe
- Detailed Order Requirements: (5.2.3 PIM - 3/1/08)
 - Start Date, Bene Name, Narrative or Brand Name/Model, Options/Accessories, Physician Signature and Date
- File claim ONLY after receipt of Physician Detailed Order

Yesterday's PMD Sequence

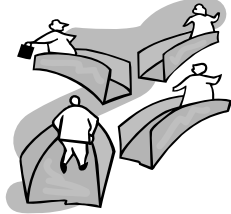
- **Supplier-driven**
 - Patient called or stopped in to see supplier
 - Supplier showed product – wrote specs
 - Supplier sent MD specs via CMN Request
 - **Patient saw MD???**
 - Supplier delivered product and filed claim after signed/dated CMN was returned

Today's PMD Sequence

- **Prescriber-driven**
 - F-T-F Exam by MD/Practitioner is required for all PMD's
 - Licensed/Certified Medical Professional (LCMP) Assessment for certain levels
 - RESNA-certified supplier ATS or ATP must have direct, in person involvement in the wheelchair selection for certain levels
 - MD/Practitioner sends Documentation Packet to Supplier within 45 days of F-T-F Exam

Supplier Responsibilities!

- Educator
- Facilitator
- Gatekeeper
- Product Provider
- Problem Solver



Issues

- Patient calls supplier for a “fitting” - FIRST
- Patient asks supplier to make MD appointment
- Physician asks supplier to make patient's assessment appointment
- Physician requests a “simple form” to complete!!

PMD Do's and Don'ts

- **MAY** provide BLANK Face-to-Face Initial Order template to MD
- **MAY NOT** provide a documentation “form”
- **MUST** scrutinize documentation – advise MD when documentation is **NOT** compliant (content or timeline problem)

PMD Do's and Don'ts

- **MAY** give synopsis of policy to prescriber
- **MAY** explain MRADL basis of coverage
- **MAY** stress safety and timeliness of documentation affect coverage

PMD Do's and Don'ts

- **MAY NOT** provide medical record form
- **MAY NOT** accept physician “letter of necessity” in lieu of chart notes
- **MAY NOT** have a financial arrangement with the LCMP doing assessment
- **MUST** advise when documentation is **NOT** compliant, **WHY** and **WHAT** needs done

Common Documentation Problems

1. A lesser level of MAE is not negated within documented notes
2. Incorrect Face-to-Face date on seven-element initial Order
3. Documentation is not sent within mandated timeline
4. Physician notes do not state exam visit was “for purpose of mobility”

PMD Timelines

- Provider **MUST** receive seven-element initial order and documentation within **45 days** of face-to-face date
- **MUST** deliver PMD within **120 days** of stamped receipt of documentation or...
- **MUST** deliver PMD within **6 months** following ADMC determination



Face-to-Face Countdown

- A. Date physician/auth practitioner sees patient and does entire exam and assessment FOR PURPOSE OF MOBILITY EXAMINATION
- B. Date physician/auth practitioner concurs with assessment ordered and done by LCMP, if patient has already been seen
- C. Date physician/auth practitioner sees patient AFTER receiving assessment, if patient wasn't seen prior to ordering an LCMP assessment
- D. Patient discharge date from skilled facility

Clinical Assessment



- E. MAY illustrate SAME F-T-F date on initial order, exam and assessment when the prescribing physician and clinician are both present and direct the exam/assessment process

EX: Center for Assistive Technology (CAT)

PMD Seven-Element Initial Order

- List requirements on **BLANK PAGE**:
 1. Face to Face Date
 2. Patient Name
 3. Diagnoses and/or ICD code(s)
 4. Product Required (specific or non-specific)
 5. Length of Need
 6. Physician Signature
 7. Signature Date

PMD Documentation Receipt Date

- A date stamp or equivalent is required on documentation received:
 - Seven Element Initial Order
 - Face to Face Examination
 - Detailed Product Description

ATS – ATP Requirement

- DATES OF SERVICE 4-1-08 forward
- **MUST** have direct in-person involvement with patient specifications
- **MUST** see patient PRIOR TO Product Delivery
- Use FAQ dated May, 2008 as audit document

PMD Home Assessment

- Supplier or Practitioner responsibility prior to or during delivery – must do on-site
- Assures PMD accessibility within the home so established MRADL's can be achieved
- Is not considered part of Medical Record

PMD Detailed Product Description

Signed, Dated and Received Prior To Delivery

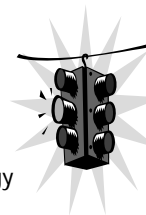
- Product HCPCS code
- Narrative product description or Manufacturer Name/Model
- List **ALL** options and accessories to be billed
- List Supplier charge **and** fee schedule allowable
 - Indicate "Not Applicable" if no fee schedule allowance

Supplier Attestation

- The LCMP involved with a patient's exam may have NO FINANCIAL RELATIONSHIP with supplier
- A Supplier signed attestation to no financial relationship with LCMP is required and must be kept on file
- If LCMP has a financial relationship with supplier, the documentation may provide additional clinical information, but IS NOT CONSIDERED part of the Face-to-Face Examination by physician

Use Compliance Tools

- Manual Wheelchair Checklist
- PMD Checklist
- PMD Initial Order Template
- Acronyms-Medical Terminology
- NCD Chronological Review



Use Compliance Resources

- LCDs - Bulletins - FAQs
- Jurisdiction A-B-C-D MAC Advisory Councils
- State Organizations and AA Homecare
- Accreditation Bodies
- Supplier Group Organizations



Questions?

