

WELCOME TO: COVID 19 PRACTICE SURVIVAL GUIDE

Week 6 of a series

Guest Speaker:

PROVIDING DME DURING A
PUBLIC HEALTH EMERGENCY.
IS YOUR OFFICE READY FOR
REQUIRED CHANGES?



*Paul Kesselman, DPM, CEO PARK
DPM Consulting, LLC*

Moderator:



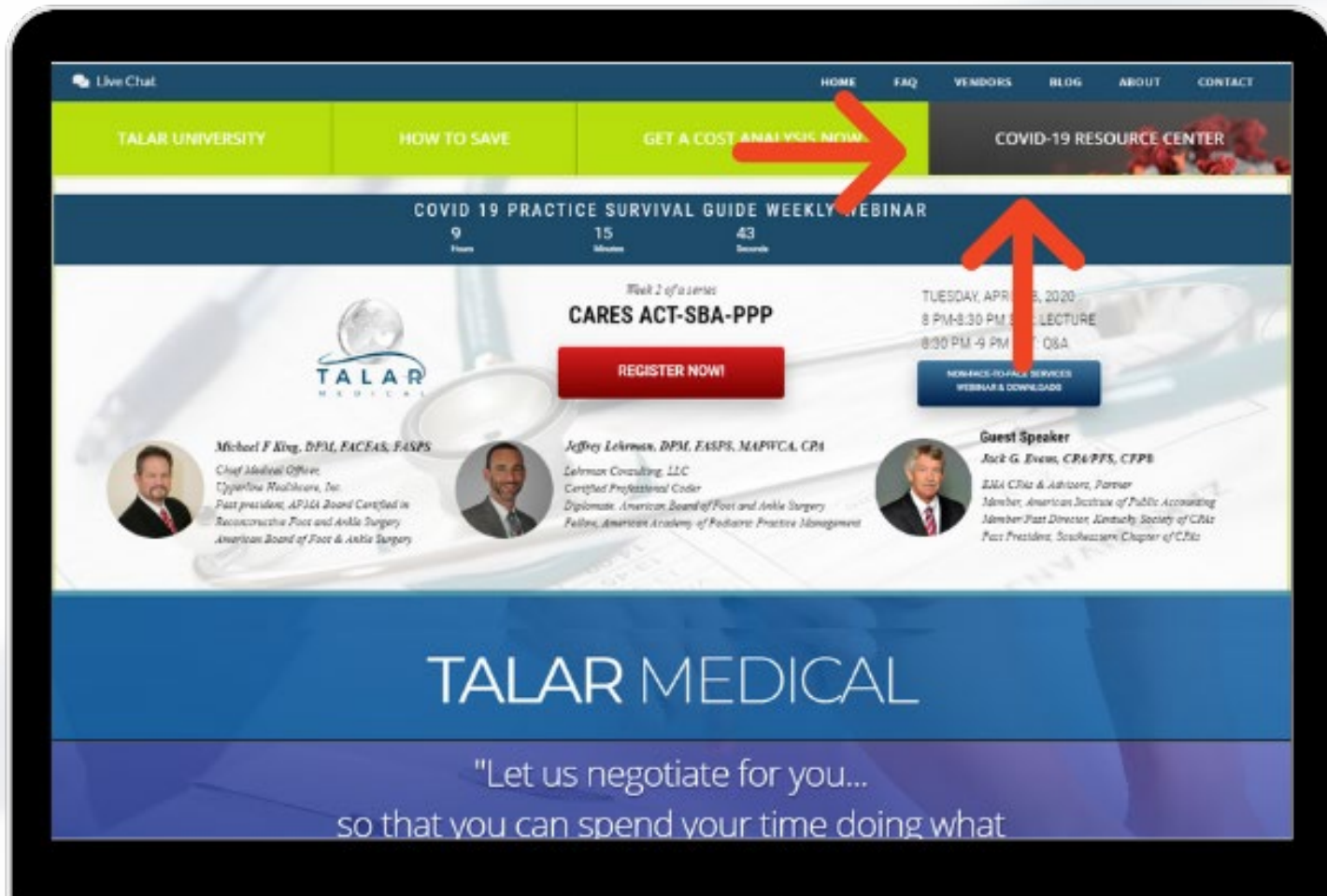
Ira Kraus, DPM, FACFAS



*Jeffrey Lehrman, DPM, FASPS,
MAPWCA, CPC*



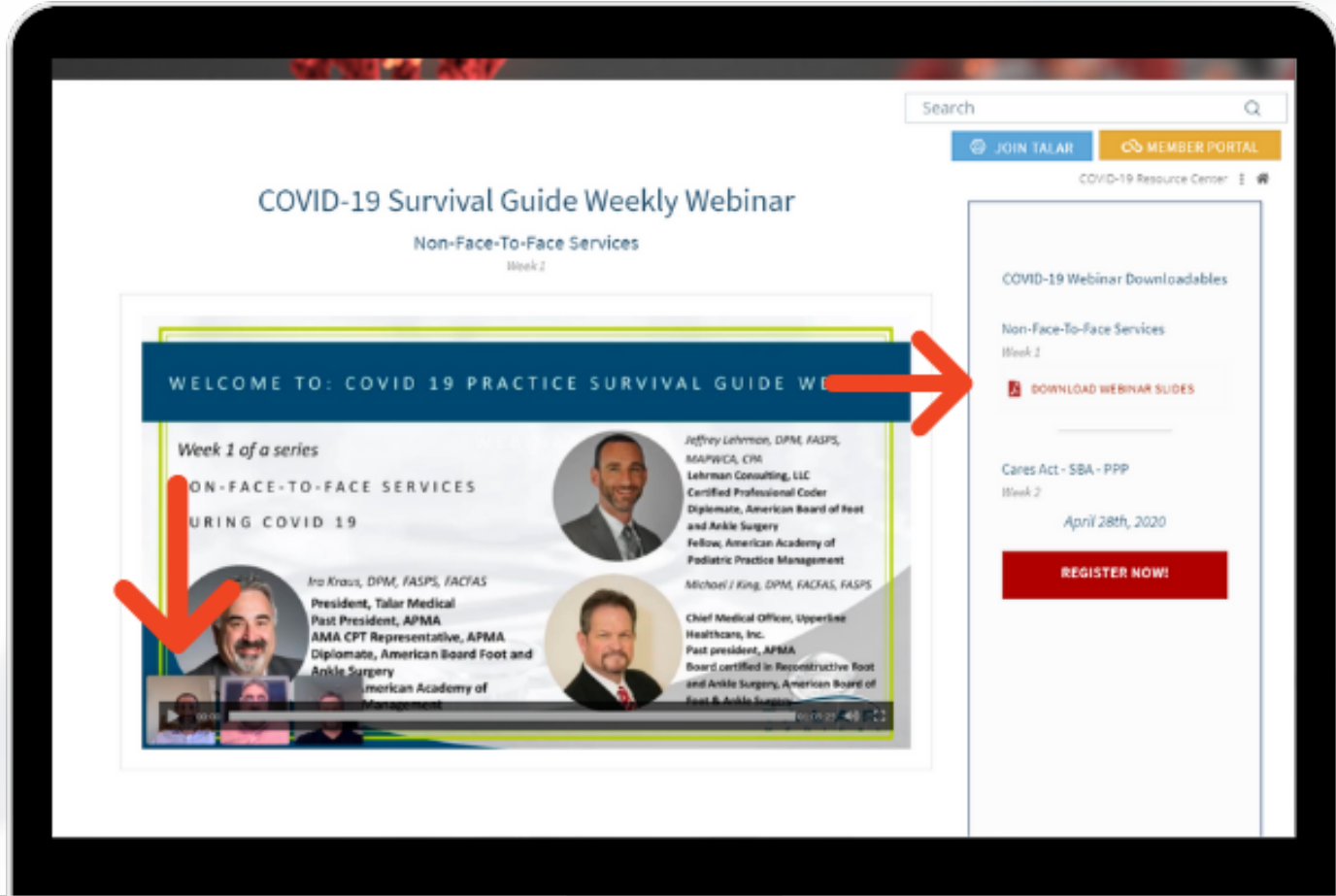
DATE	TOPIC	GUEST SPEAKER
21 April 8 PM EST	Non-Face-To-Face Services During COVID 19	<i>Jeffrey Lehrman, DPM, Michael King, DPM (Moderator)</i>
28 April 8 PM EST	CARES ACT, SBA, PPP	<i>Jack Evans, CPA</i>
5 May 8 PM EST	Supply Chain Management	<i>Scott Wakser, Melody Andrews</i>
12 May 8 PM EST	Bringing Employees Back to Work	<i>Susan Lessack, Tracey Diamond</i>
19 May 8 PM EST	In Office Wound Care Dispensing – Pre/During/Post COVID	<i>Ira Kraus, DPM</i>
26 May 8 PM EST	Providing DME During A Public Health Emergency. Is Your Office Ready for Required Changes?	<i>Paul Kesselman, DPM</i>
2 June 8 PM EST	What Retirement Savers Should Know About the CARES Act & the Secure Act	<i>Deanna Filosa</i>
9 June 8 PM EST	No More Excuses: Reinventing your Practice During a Forced Slow Down	<i>Cindy Pezza, CMA</i>
16 June 8 PM EST	PICA	<i>Ross Taubman, DPM</i>
23 June 8 PM EST	Diabetic Shoes as it relates to COVID	<i>Josh White, DPM</i>
30 June 8 PM EST	Streamline Biological Utilization	



Would you like to find a replay of tonight's webinar? Find it on our website today!

1. Visit our website www.TalarMedical.com
2. Look for our COVID 19 Resource Center located in the upper right hand corner





- Inside the COVID 19 Resource Center you will find:
- An archive of the entire webinar series “COVID 19 Practice Survival Guide”
 - A downloadable version of the lecture slides.
 - Updates, news, and information regarding COVID 19 and your practice



Want to receive a personalized, no obligation medical supply cost analysis?

This is how

1. Send us the products you are currently ordering in excel spreadsheet format. Please include:
 - Current Vendor
 - Item Description
 - Manufacturer Number/SKU
 - Unit of Measure
 - Price
2. Email the spreadsheet to admin@talarmedical.com or visit our website at talarmedical.com/complimentary-medical-supply-cost-analysis/
 - * Can't easily provide the information in an Excel format? We have you covered! Just send us a copy of your most recent receipts. Please note, comparisons presented in receipt format do require longer to turn around.

Biography

- Dr. Kesselman has been in practice since 1982 and is ABPS Certified in foot surgery since 1992.
- Part time practice since 2015.
- Providing health care consulting to physicians via PARE Compliance
- Provides consulting services to Medical Manufacturers on a variety of issues as CEO of Park DPM
- Member of all Medicare DME Councils, Head of APMA DME Workgroup and member APMA Health Policy and Practice Committee
- NYSPMA Insurance Committee
- DME Expert to Codingline
- Contributing Author to Podiatry Management



COVID and DME

Where Are We Now and What is the Future?



Disclaimer

- These are the opinions of Dr. Kesselman
- Any reproduction or use of this presentation without the express permission of Dr. Kesselman and Talar Medical are prohibited.
- Dr. Kesselman is not a paid employee of CMS or Talar Medical
- All the opinions expressed here are the sole opinions of Dr. Kesselman

This Will Not Be A Lecture on DME COVID and

- PPP
- SBA Loans
- Attestation Issues regarding HHS Stimulus
- Unemployment Issues
- Protocol for testing of employees
- Protocols for Staff Who Report to Work Ill
- Medical Leave and Staff
- For those issues please check with your health care attorney and accountant frequently!



DME & Your Facility

- Ready To Receive Patients?
- PPE and Staff, Patients
- Appointments Properly Spaced Out
- Equipment Preparation
- Fever Monitoring of Patients
- Liability Issues if You Do Not Follow Proper Local, State & Fed. Ordinances



During the PHE

- NSC Has Waived Many Requirements Including:
- Supplier Standards #7: Maintain Access to a Physical Facility
- Supplier Standards #9 Maintain Primary Business (Landline Phone)
- Supplier Standards #30 Minimum Number of Hours (30) Waived-
- This should NEVER apply to DPM

NSC Issues During PHE

- Drive By Inspections with Exterior Photos Only (NSC Not Waiting for these photos for approval)
- Revalidations are Suspended
- Expeditious Treatment to New Suppliers
- Application Fees Currently Waived

New Provider or New Location Enrollment

- Provide: NPI, SS#, Valid In or Out of State License
- Address Information
- Screening Over Phone to initiate temporary billing privileges
- Suppliers Assigned March 1, 2020 effective date
- Billing privileges granted on provisional basis during PHE and are temporary
- Upon termination of PHE must complete 855S and pay the triannual fee
- Failure to respond within 30 days of notification will result in deactivation
- Contact NSC: (866 238 9652)



LCD Issues

- Orthotic/Prosthetic/Surgical Dressings LCD Requirements Intact
- Some Notable Exceptions
- Prescribing Telehealth Visits by all Qualified HCP Are Suitable Substitutes for In Person Visits
- In Person Visits Still Required for Many Fitting & Dispensing

Devices Lost/Stolen/Irreparably Damaged

- Contractors have the **flexibility** to waive replacement requirements such that the F2F requirement, a new physician's order, and new medical necessity documentation are not required.
- This regulation is limited only to those devices lost, stolen or damaged due to the PHE (e.g. device lost in ambulance on way to hospital)
- This Is No Guarantee of Payment- CR Modifier-Dispensed during PHE
- Document COVID departure from LCD requirements
- Can Use KX Modifier to Document Compliance with LCD

ABN During PHE

- Current ABN Was Due to Expire 3/20
- Continues to Be Effective During PHE & Until Further Notice
- If ABN could not be signed due to COVID 19 Stipulate, why not?
- Valid Reasons Include: Patient would not permit F2F with you
- Attempt to obtain signed ABN prior to delivery via fax, phone, mail, etc.
- Name the person who signed the ABN if not the patient.

Therapeutic Shoes and COVID 19 (Part 1)

- MD/DO Exams Conducted By Telehealth Are Acceptable
- MD/DO Certifications Based on Telehealth Exams Acceptable
- Telehealth Foot Exams by MD/DO Documenting Local Foot Findings Acceptable
- Telehealth Foot Exams by DPM ? Not all states prior to COVID allowed DPMs to Bill Telehealth. During PHE this is waived. Post COVID?

Therapeutic Shoes and COVID (Part 2)

- Fitting and Dispensing- Require In Person Exams
- Mandated by Quality Standards Which Are Statutory Requirements
- Statutory Requirements Cannot Be Usurped by Regulatory (IFR)
- In Person Exams are Required for Fitting & Dispensing of T. Shoes
- ? MIPPA Passed in 2008 –Quality Standards DO NOT Apply to Certain HCP-MD/DO/DPM, C.O.
- So Where Do We Stand?
- Would It Be Wise to Do So?
- How Can you Heat Mold an insert or assure total contact remotely?

Orthotics & Prosthetics During the PHE

- Response: CMS guidance on telehealth only applies to practitioner types eligible to bill for telehealth services; however, guidance in CMS-1744-IFC instructed the DME MACs on an interim basis to not apply certain requirements for face-to-face/in-person encounters for beneficiaries, health care professionals and suppliers
- Telemedicine Fitting and Dispensing Permitted For DPMs.
- O/P Alliances Currently Pushing for Telemedicine Dispensing
- Wise?

Surgical Dressings During the PHE

- Literally No Changes To Prior to PHE
- Delivery Can Be: In person, Shipped from Your office, from Third Party
- Tracking Number of Shipping Company Can Be Used as WPOD
- Patient Must Have Had A “Recent” Debridement
- Recent is “Ill” Defined.

Surgical Dressings and PHE

- Recent measurements & Drainage (high/medium/low) qualifications
- Any Collagen Dressing (A6021, A6022, A6023 and A6024) continue to require PDAC approval

DME and Prof Liability Issues

- If you can't palpate fit remotely how can you assure proper fit?
- If you can't smell or see into the wound how can you properly Rx dressings?
- PPE for yourself, your staff?
- Off Site Non-Essential Workers (e.g. Billers, etc.)
- Patient Protection Issues (Masks, PPW Completion outside office, etc.)

ADC Coverage Issues

- Documentation is Still Paramount
- CMS Relaxing Requirements to DME MAC \neq LCD Forgiveness
- Appeals Processed With or W/O Appointment of Representation Forms
- TPE Audits Dated $>3/1/20$ all been released for payment
- SMRC & RAC Post Payment Audits $>$ March 1, 2020 Suspended
- No Additional Documentation Requests During PHE
- Post PHE: What Will Happen to These Audits?



Is Your DME (Practice) Ready for Reopening?

- PPE for Employees and Patients- Which Employees
- Minimize Time in Office for Patients and Staff
- Have PPW Done As Much As Possible Prior to Office Visit
- Who Can Work Remotely?, Who Cannot?
- Federal/State/Municipal Regulations on Paid Staff Leave

Thank You!

Join us #TalarTuesday, June 2, 2020 at
5 PM PST/8PM EST for *What Retirement Savers
Should Know About the Cares ACT & the Secure Act*
with guest speaker
Deanna Filosa



DATE	TOPIC	GUEST SPEAKER
21 April 8 PM EST	Non-Face-To-Face Services During COVID 19	<i>Jeffrey Lehrman, DPM, Michael King, DPM (Moderator)</i>
28 April 8 PM EST	CARES ACT, SBA, PPP	<i>Jack Evans, CPA</i>
5 May 8 PM EST	Supply Chain Management	<i>Scott Wakser, Melody Andrews</i>
12 May 8 PM EST	Bringing Employees Back to Work	<i>Susan Lessack, Tracey Diamond</i>
19 May 8 PM EST	In Office Wound Care Dispensing – Pre/During/Post COVID	<i>Ira Kraus, DPM</i>
26 May 8 PM EST	Providing DME During A Public Health Emergency. Is Your Office Ready for Required Changes?	<i>Paul Kesselman, DPM</i>
2 June 8 PM EST	What Retirement Savers Should Know About the CARES Act & the Secure Act	<i>Deanna Filosa</i>
9 June 8 PM EST	No More Excuses: Reinventing your Practice During a Forced Slow Down	<i>Cindy Pezza, CMA</i>
16 June 8 PM EST	PICA	<i>Ross Taubman, DPM</i>
23 June 8 PM EST	Diabetic Shoes as it relates to COVID	<i>Josh White, DPM</i>
30 June 8 PM EST	Streamline Biological Utilization	