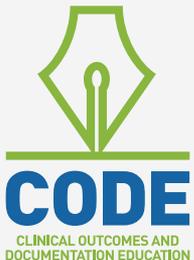

Documentation Changes That Work!

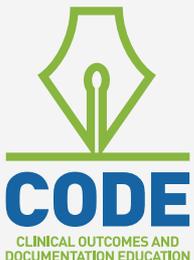
Better documentation leads to overturn of denial before ALJ level

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CODE Webinar

- Read the policy
- Medicare advisory bulletins give common issues
- Gave webinars
- Asked participants what changes helped them get paid
- P&O practices told me several things that made a difference for them
- The most common are what I'll present to you today



Two Improvement Areas

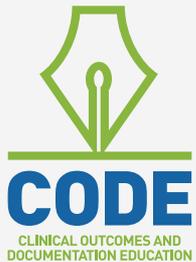
- Doctors Notes
- P&O Notes

Doctors Notes

- What they write
 - General health info (not a P&O focused appt)
 - Contradictory to P&O findings
 - No mention of P&O device
 - No mention of why they need device (medical necessity)
- What we do with them
 - Don't get them
 - Don't read
 - Read late but don't send because of mismatch

Example

Care Timeline



- 4/8: Test socket good, pt. will attend PT
- 4/8: Wound in groin, pain with prosthetic use
- 4/23: Pt. trying to set up PT
- 6/6: Pt. not taking care of herself
- 8/13: PMD needed, shoulder pain, progressively gotten worse, ADL's compromised, loss of strength, pt. should avoid activity
- 8/21: Pt. uses leg 10 plus hrs./day, adjusted socket to address groin pain
- 10/22: Daily prosthetic use, K3, socket doesn't fit but patient's gait is good, new socket will allow increased activity to control weight
- 11/3: PMD needed, COPD, CHF, and amputation causes difficulty with ambulation, endurance, and ADL's, QoL is low. Pt. has had multiple accidents, cannot use walker, cane or manual chair. Pt. is willing and motivated to use PMD

Solution

- Make patient go to the MD first
 - General health info (not a P&O focused appt)
 - Contradictory to P&O findings
 - No mention of P&O device
 - No mention of why they need device (medical necessity)

Doctors Notes

- Policy
 - PIM 3.7: Suppliers showing a pattern of failing to comply with requests for additional supporting documentation may be subject to medical review for all claims.
 - A “pattern” is TWO or more ADR’s that go unanswered

P&O Notes

- Don't match doctors notes
 - We've already covered this
- Not Important?
 - Not valued by payer
 - Payer only reads doctor notes
 - Don't influence payment
 - Just use a template

P&O Notes

- LCD for Lower Limb Prosthetics states
 - “Coverage is extended only if there is sufficient *clinical documentation* of functional need for the technologic or design feature of a given foot [or knee].”

P&O Notes

- PIM 3.3.2.1.1
 - CMS does not prohibit the use of templates for doctors. However,
 - Templates used to gather selected information focused primarily for reimbursement purposes are often insufficient to demonstrate that all coverage and coding requirements are met.

P&O Notes

- CMS uses natural language processing software
 - Does not recognize check boxes
 - *Does* recognize cookie cutter language

P&O Notes

Template language

- Example L5981

Quantity: 1 L5981 -Flex-walk foot system. This foot design stores and returns energy during the gait cycle. This reduces a patient's energy expenditure and allows for increased activity. It is a system used for K3 functional classifications. It primarily uses carbon plates to perform this function that are fabricated in a way to match a patient's weight and activity level. It is medically necessary in this case because the patient meets the K3 criteria and it has been ordered by a physician.

P&O Notes

Check box template

Diagnostic socket(s) Required: Yes No Number of socket(s) anticipated: 1

Use of diagnostic socket(s) necessary to evaluate/treat: N/A Suction suspension Unusual muscle contour/suture lines Scarring

Fragile Skin Other: _____

Describe socket design to be provided, including materials (check all that apply):

N/A Suction Total Contact Flexible w/rigid Frame Laminated Thermoplastic IC/Narrow M-L

Cushion (Air, fluid, gel) Acrylic PTB PTSC Vacuum system

Other: _____

How will socket Design and Material functionally benefit this patient (check all that apply):

N/A Improve Suspension Optimum pressure distribution Proximal tissue containment Reduction of prosthesis weight

Increase Socket Strength Accommodate anatomical anomalies Increase M/L stability Donning/Doffing assistance Improve proprioception

Increase weight bearing

Other: _____

Describe suspension/interface proposed for this patient (check all that apply):

Silicone or equal insert, locking Prefabricated Custom

Silicone or equal insert, non-locking Prefabricated Custom

N/A

Rationale for custom Design: _____

Locking pin or equal Multi-durometer insert Distal cushion Lacer Joints and lacer Suction/sealing sleeve

Knee Sleeve Cuff/strap/belt suspension Socket Insert (pelite, kemblo, aliplast, etc.) Supracondylar/anatomical

Other: _____

Describe how the suspension/interface will functionally benefit this patient (check all that apply):

N/A Accommodate fragile skin Increased prosthetic suspension Decrease in limb pistoning Increased anatomical joint stability

Distal limb pressure reduction Reduction in tissue shear forces Accommodate bony prominences

Other: _____

Describe the foot design proposed for this patient:

N/A External Keel, SACH (K1-4) Flexible Keel (K2-4) Single Axis ankle/foot (K1-4) Energy Storing (K3-4)

Multi-axial ankle foot (K2-4) Flex foot system (K3-4) Flex walk or equal (K3-4) Dynamic response, one piece (K3-4) SACH (basic)

Shank foot system with vertical load pylon (K3-4) Other: _____

How will this foot functionally benefit this patient? N/A Walk on uneven ground Walk farther with reduced weight

Provide increased activity level Bilateral considerations Other: _____

Is a vertical loading/shock reducing pylon indicated for this patient? No Yes (explain)

Reduce impact at heel Increase shock absorption Increase energy efficient gait Reduce skin shear Perform high stress activities

Other: _____

Is an adjustable foot heel height feature indicated for this patient? No Yes (explain)

Cosmetic purposes: _____

Functional purposes: _____

P&O Notes

- Clinical Reasoning
 - Bob's problem = can't walk more than 6 hours of his 8 hour shift at work as an assembly line manager
 - Reason = fatigue
 - Solution for Bob = a foot that decreases energy expenditure by storing and releasing energy during ambulation
- Narrative notes that are consistent with doctors notes and link patient need to device features

P&O Notes

$$\frac{\text{Dollar amount of services paid in error}}{\text{Dollar amount of services reviewed}} = \text{Provider Error Rate}$$

PIM 3.7.1.1

PIM & Other Internet Only Manuals

- <https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Internet-Only-Manuals-IOMs.html>

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