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## Today's Objectives

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1. Bring together those providing CRT during the COVID-19 Pandemic
2. Review what answers we have, the help available, and what we are working on
3. Provide forum for open discussion of CRT access issues and solutions

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## Last Week's CRT Webinar

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- COVID-19 focused; presented April 2
- 45-minute overview and update
- Available at <https://vimeo.com/403509374>
- Email [mlee@ncart.us](mailto:mlee@ncart.us) for handout

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## Contacts for Follow Up

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## Ongoing CRT Actions

- Industry CRT COVID-19 Workgroup
- Discussions with CMS
- Follow up with Medicaid programs and commercial payers
- Continued collaboration with advocacy partners: AA Homecare, VGM/US Rehab, State Associations
- Other targeted COVID-19 activities

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## Sources of Relief/Guidance

- The CARES Act (Coronavirus Aid, Relief, and Economic Security)
- Interim Final Rule CMS-1744-IFC
- CMS COVID-19 Bulletins and Fact Sheets
- CMS and DME MAC Webinars
- Instructions from DME MACs (waiting for)

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## CRT Relief Focus

- Waive face-to-face requirements
- Allow remote technology for clinician and RTS ATP involvement- specialty evaluation, ATP participation, home assessment
- Allow PTs and OTs to bill under telehealth
- Develop relaxed provisions if urgent need for new/replacement equipment
- Allow repairs without Prior Authorization confirmation of continued need by physician

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## Medicare Prior Authorization

- Program suspended - PA for PMDs not required, but option remains
- If billing for item that requires PA and you are bypassing, must include CR modifier and in narrative indicate "COVID-19"
- Claims bypassing PA may be selected for post payment review after PHE

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## Medicare Proof of Delivery

"Given the nature of the pandemic and the inability to collect signatures during this time, CMS will not be enforcing the signature requirement. Suppliers should document in the medical record the appropriate date of delivery and that a signature was not able to be obtained because of COVID-19."

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## Medicare In-Person Encounters

- Additional in-person encounters required by an LCD are: specialty evaluation performed by a licensed/certified medical professional (LCMP); in-person involvement by a RESNA-certified Assistive Technology Professional (ATP) employed by a CRT supplier; and an on-site home assessment of residence.
- Please confirm that those three encounters are not required based on the IFC and for the duration of the pandemic.

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## Medicare Documentation

- What needs to be available to bill CRT claims under COVID-19 waivers
- CRT wheelchairs
- Wheelchair repairs

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## PT/OT Telehealth

- Payer specific regulations – Medicare, Medicaid, commercial insurers
- Two clauses – (a) what CPT codes are billable and (b) what clinicians can bill those
- Medicare has approved codes but has NOT YET approved PTs and OTs to use them
- Some Medicaids and commercial insurers are allowing.....list is growing

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## CRT Telehealth Codes

- 97112 - Therapeutic procedure, 1 or more areas
- 97161 to 97163 - Physical therapy evaluation
- 97164 - Physical therapy re-evaluation
- 97165 to 97167 - Occupational therapy evaluation
- 97168 - Occupational therapy re-evaluation
- **97542 - Wheelchair management (must be added)**
- 97750 - Physical performance test or measurement
- 97755 - Assistive technology assessment
- 97760 - Orthotic(s) management and training

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## CMS CRT Telehealth Requests

- Allow physical therapists and occupational therapists to provide telehealth services under CMS' expanded authority.
- Add CPT Code 97542 Wheelchair Management (e.g., assessment, fitting, training) to the list of approved telehealth codes to allow their remote involvement in complex rehab wheelchair and seating.

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## Clinician Perspective

**Cathy Carver, PT, ATP/SMS**  
**Executive Director, Clinician Task Force**  
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## Clinician Issues/Activities

- Current clinician considerations and issues
- Service delivery options: In-clinic; In-Home; Telehealth; Other
- COVID-19 Decision Tree

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### Serving Complex-Needs Patients During COVID-19

It's always best practice to care for your patients one-on-one when determining their Complex Rehab Technology (CRT) needs. However, protecting their health at this time is equally important and in-clinic visits may not be the best option. Use the chart below to help determine if your patients with complex needs must be seen in-clinic or if other options might be more appropriate.

**Does your patient have:**

- AN URGENT NEED FOR NEW EQUIPMENT?
- A NEED TO REPLACE "LIKE FOR LIKE" EQUIPMENT? CONTACT THE SUPPLIER.
- AN URGENT NEED FOR MODIFICATION OR REPAIR? (i.e. seating needs, pain, skin changes, sitting tolerance)
- A MECHANICAL OR REPAIR ISSUE? CONTACT THE SUPPLIER.
- EQUIPMENT THAT NEEDS TO BE FITTED?

**IS YOUR CLINIC OPEN?**

- YES**
  - IS THE PATIENT HIGH-RISK FOR COVID-19? (OR HESITANT TO COME INTO THE CLINIC)**
    - NO**
      - IF IT CANNOT WAIT, SCHEDULE AN APPOINTMENT.
      - COORDINATE WITH THE PATIENT, CAREGIVER, SUPPLIER, AND PHYSICIAN (AS NEEDED) TO PREPARE FOR THE APPOINTMENT SO THERE ONLY NEEDS TO BE ONE VISIT.
    - YES**
      - CONSIDER HOME HEALTH OPTIONS
      - CONSIDER TELEHEALTH OPTIONS
      - CONTACT ON CALL PT/OT
      - REFER TO AN OPEN CLINIC
      - EXPLORE LOAN CLOSET OPTIONS
      - CONTACT THE SUPPLIER FOR OPTIONS
  - NO**
    - CONSIDER HOME HEALTH OPTIONS
    - CONSIDER TELEHEALTH OPTIONS
    - CONTACT ON CALL PT/OT
    - REFER TO AN OPEN CLINIC
    - EXPLORE LOAN CLOSET OPTIONS
    - CONTACT THE SUPPLIER FOR OPTIONS

Have more questions or need assistance? Contact the Clinician Task Force at [cliniciantaskforce@gmail.com](mailto:cliniciantaskforce@gmail.com)

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## Employee/Customer Safeguards

- CDC guidance
  - <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>
- OSHA guidance
  - <https://www.osha.gov/Publications/OSHA3990.pdf>

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## Business Assistance

- SBA Guidance and Loans
  - <https://www.sba.gov/page/coronavirus-covid-19-small-business-guidance-loan-resources>: Paycheck Protection Program-all/some of loan “forgiven” if you maintain workforce.
- Medicare Accelerated/Advanced Payments
  - <https://www.cms.gov/files/document/Accelerated-and-Advanced-Payments-Fact-Sheet.pdf>

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## Sign Up For Email Updates

- Visit [www.access2crt.org](http://www.access2crt.org) – CRT focused website
- Sign up to receive timely CRT advocacy related updates, including COVID-19 information

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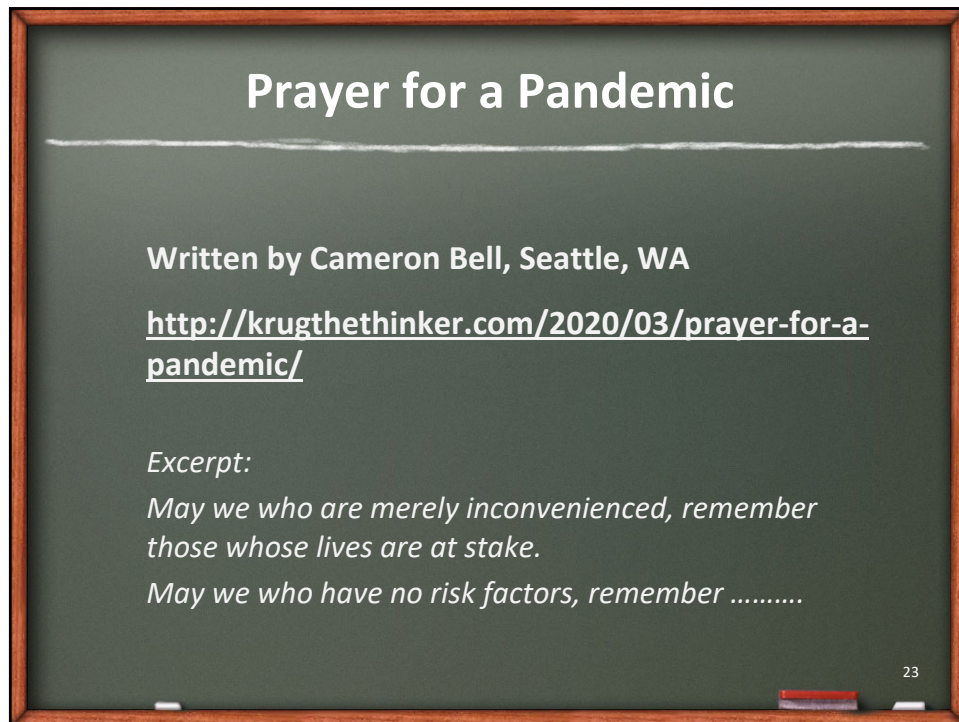
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## Other Helpful Websites

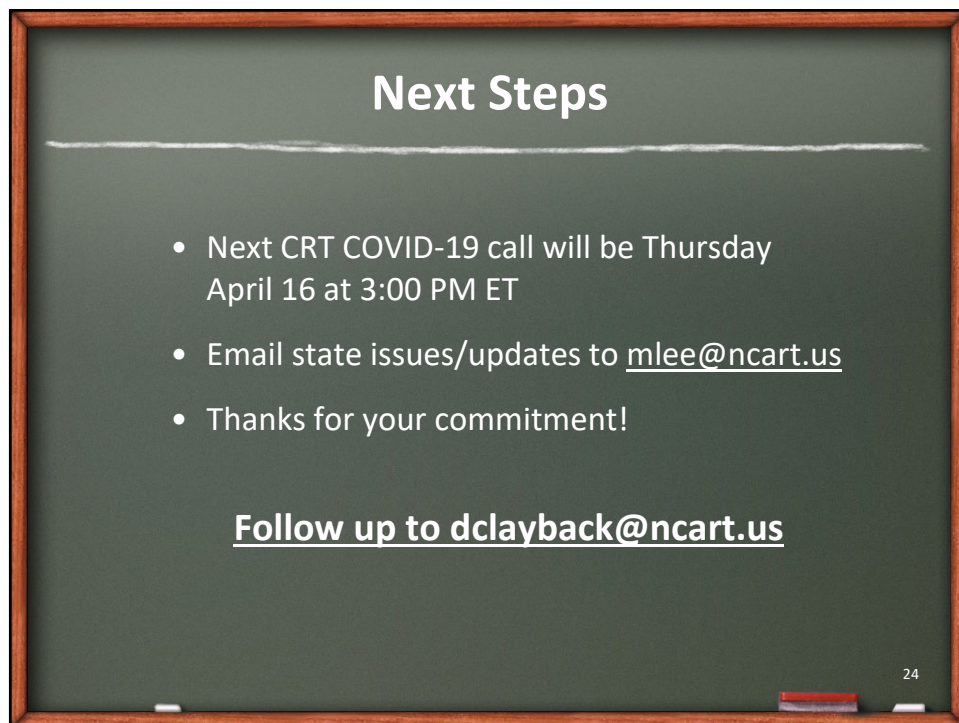
- <https://www.cms.gov/outreach-education/partner-resources/coronavirus-covid-19-partner-toolkit>
- <https://www.coronavirus.gov>
- <https://www.aahomecare.org/covid-19-resources>
- <https://www.vgm.com/coronavirus/>
- [www.hmenews.com/coronavirusoutbreak](http://www.hmenews.com/coronavirusoutbreak)

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## Q & A Panelists

**Cathy Carver**, Clinician Task Force, Executive Director

**Dan Fedor**, U.S. Rehab, Director of Reimb. & Education

**Seth Johnson**, Quantum Rehab, SVP Government Affairs

**Rita Stanley**, Sunrise Medical, VP Government Relations

**Jim Stephenson**, Permobil, Reimb. and Coding Manager

**Weesie Walker**, NRRTS, Executive Director

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