

Pursuing a Separate Benefit for Complex Rehab Technology

Why?...What?...How?

October 13, 2009

Why Pursue Separate Benefit

The purpose of a separate benefit is to **improve and protect access** to Complex Rehab Technology products and services for individuals with significant disabilities and medical conditions.

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Key Stakeholders & Influencers

- Consumers
- Clinicians
- Complex Rehab Technology Providers
- NCART, AAHomecare, NRRTS, RESNA
- State Associations
- DME MAC Medical Directors
- CMS
- Congress

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Multiple Issues and Challenges

- Coverage Barriers to Access
 - “In the Home” restriction
 - LCDs that restrict access based on diagnosis, patient weight or some other criterion
- Regulations and Policies
 - Documentation requirements
 - Timeline and procedural conditions for coverage
 - Physician face-to-face
 - Detailed Product Prescription cannot be written before face-to-face completed

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Multiple Issues and Challenges (cont'd)

- Inadequate HCPCS Codes
 - Inappropriate grouping of technology
 - Technological distinction
 - Wide range of costs
 - Varying clinical application
 - Inappropriate fee setting
 - Medicare pricing methodology uses deflation and median pricing- does not result in adequate reimbursement for the products at the top of the pricing scale and, in some cases, too high for those at the bottom.

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Multiple Issues and Challenges (cont'd)

- Fee Schedule Problems
 - 9.5% cut to power wheelchairs and related accessories.....needs rescinding
 - Medicare pricing does not reflect cost of technology
 - Medicare pricing does not reflect cost of necessary SERVICES and SUPPORT
 - Non-Medicare payers use Medicare fee schedule as basis for payment
 - Must exempt ALL complex rehab technology from competitive bidding
 - Must stabilize the industry and insulate from future cuts

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Multiple Issues and Challenges (cont'd)

- Lack of Upfront Processes to Verify Coverage
 - Need to expand and improve ADMC
 - Need individual consideration process that allows for medical review before the product is provided for those clients that DO NOT meet stated coverage
 - Prior Authorization???

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Multiple Issues and Challenges (cont'd)

- Quality Standards
 - Require clearer definition of complex rehab technology
 - Require standardization of accreditation process for complex rehab companies
 - Quality Standards must align with industry best practices

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Outcomes of Separate Benefit

1. Clearer and more consistent coverage policies to address needs of individuals with disabilities.
2. Tighter provider standards to promote better clinical outcomes and consumer protection.
3. Recognition of the depth and cost of product-related and clinical services required.
4. Future payment stability to ensure continued access to products and services.
5. An improved model for Medicaid and other payers to follow.

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We're In The Planning Phase

1. Form Steering Committee. *(completed)*
2. Define goal and objectives. *(completed)*
3. Research potential options and strategies.
4. Gather comments and feedback from stakeholders through teleconferences, group discussions, and Consensus Conference.
5. Develop Action Plan with strategies, tactics, timeline, and resources.
6. Obtain stakeholders' endorsement of Action Plan and begin implementation.

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Steering Committee

- The Steering Committee will provide direction and coordinate activities; positions held by representatives from four organizations
- Chaired by Don Clayback, NCART Executive Director
- NCART - Gary Gilberti, President of Chesapeake Rehab Equipment; and Rita Hostak, Vice President of Government Affairs, Sunrise Medical
- AAHomecare - Tim Pederson, President of West Med Rehab; and Walt Gorski, Vice President of AA Homecare

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Steering Committee (cont'd)

- NRRTS - Simon Margolis, NRRTS Executive Director
- RESNA - Elizabeth Cole, Director of Clinical Rehab Services at the VGM Group
- The Committee will also include Clinician and Consumer representatives. Laura Cohen, PT, PhD, ATP, will be serving as a clinical advisor.
- Additional individual work groups will be established to address specific areas

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Avalere Health Report

- Avalere Health is a Washington, DC based research and consulting company
- Asked to identify and research options for Separate Benefit and make recommendations
- Focused on high level analysis
- Recommended:
 - Continue to work on interim improvements
 - Pursue new benefit category through Congressional legislation with inclusion of CMS in process

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Specific Issues and Solutions

Current problems will be identified and addressed under 5 distinct areas:

1. Coverage Policies & Conditions For Payment
2. Provider Qualifications
3. Fee Schedule
4. Coding
5. Claims Processing

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Get Stakeholder Input

- Two Webinars-
 - Wednesday September 30th at 3:00 PM ET
 - Thursday October 8th at 5:00 PM ET
- Medtrade Panel Discussion- Tuesday October 13th at 3:00 PM entitled “Complex Rehab General Session: Benefit Reform Update”
- Consensus Conference- Thursday October 29th in St. Louis, Missouri from 8:00 AM to 3:30 PM CT

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October 29th Consensus Conference

- Thursday October 29th in St. Louis, Missouri
- From 8:00 AM to 3:30 PM CT
- Crowne Plaza Airport Hotel (one mile from the St. Louis airport)
- To provide forum for open discussion:
 - Needs and objectives
 - Potential strategies
 - Action Plan
- Registration required- send to dclayback@ncart.us

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Steering Committee Contacts

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