



March 24, 2020

All Payers

Re: Time Sensitive - Request for Flexibility in Providing DMEPOS to Ensure COVID-19 Patients Receive Appropriate In-Home Care

The American Association for Homecare (AAHomecare) is writing to request that commercial insurance carriers make certain accommodations regarding the provision of durable medical equipment, prosthetics, orthotics, and supplies (DMEPOS), and home infusion therapy, to enable DMEPOS providers to assist patients during the COVID-19 emergency.

AAHomecare is the national organization representing DMEPOS providers, manufacturers, and other stakeholders in the homecare community. Our members are in patients' homes every day and are uniquely qualified to be able to assist during the COVID-19 pandemic.

DME providers serve millions of beneficiaries in their homes, and we expect that number to grow significantly with the spread of the COVID-19 virus. AAHomecare members and other members of the DME community supply home oxygen therapy, ventilator services, and many other necessary items and services that allow patients to be released from hospitals, nursing homes, and other health care facilities to complete their recovery.

The current COVID-19 outbreak presents many challenges to our health care system. If the virus spreads and hospitals reach capacity, we will see an increased need for treatment of people at home for a number of health issues, including those directly related to COVID-19. Hospitals will need to be discharging increased numbers of patients into their homes to prevent exposure in the hospital setting and to free up resources and hospital beds. This will put a strain on the provision of DMEPOS items and services, particularly for providers of home oxygen and ventilators. It is critical to have a strong, well-supported, and financially viable DMEPOS infrastructure to allow patients to recover at home.

In the short term, there are a number of "red tape" issues that can be alleviated today to ensure that patients with acute conditions can access medically necessary home ventilator, home oxygen therapy, and other DMEPOS items and services. Listed below are recommendations which will allow the DMEPOS industry to focus on current emergency patient situations.

Time is of the essence. The faster our members can be assured that these modifications can be accommodated, the faster many beneficiaries will have access to medically necessary home ventilation,



oxygen therapy, and other DMEPOS items and services. The DME community stands ready to provide meaningful assistance to alleviate hospital overflow issues and enable beneficiaries to recover in their homes, the safest and most cost-effective place of care. AAHomecare and the DME industry policy recommendations are as follows:

1. It is imperative that provider cashflow is not interrupted to ensure providers are able to continue servicing patients in this time of need. Claims adjudication and processing must occur on normal schedule.
2. Provide coverage for short term oxygen for beneficiaries with acute conditions to ease hospital overflow issues.
3. Allow for coverage and reimburse equipment, supplies, and services provided to patients with a confirmed COVID-19 diagnosis.
4. Waive all prior authorization and re-authorization requirements for all DMEPOS items and repairs.
5. Waive prior authorization requirements for exceeding quantity limitations on gloves, incontinence, urological, ostomy, oxygen, suction, ventilators, enteral, and wound care supplies.
6. Reduce burdensome paperwork requirements by allowing the standard prescription documenting any required test results to meet medical policy documentation requirements for a 270-day period.
7. Waive any face to face requirements if prescriber couldn't or wouldn't do an office visit, and allow telehealth visits to meet requirements while waiving the video component. Recent federal guidance to reduce barriers to telehealth services is a step in the right direction. <https://www.medicaid.gov/medicaid/benefits/downloads/medicaid-telehealth-services.pdf>
8. Allow an extension of the expiration date of written orders for an additional nine months from the date orders currently expire for recurring medical supply orders and on-going DME rental claims.
9. Allow in home sleep testing through an independent testing facility (IDTF) to qualify beneficiaries for PAP devices.
10. Allow additional oxygen, PAP, ventilator, and suction supplies for patients who become sick or diagnosed with COVID-19.
11. Waive signature requirements for proof of delivery on DME items, including allowance of text, email, photographic, or confirmed shipment receipt from third-party carrier evidence to validate proof of delivery during COVID-19 crisis.
12. Waive all place of service edits that would normally result in a claim denial for DME while a patient is placed in an in-patient facility related to COVID-19.
13. Add coverage without prior authorization for code A4928 (surgical masks, per 20).
14. Allow minimum of 180-days timely filing for Medicaid and Medicaid managed care plans.
15. Suspend all audits to allow DMEPOS providers to focus on their emergency activities...
 - A. Exempt providers from future audits on patients with COVID-19.
 - B. Discontinue sending new audit/ADR requests and extend existing audits due dates by 180-days.
 - C. Extend appeal deadlines by 180-days past the current appeal requirements.



16. Allow any requirements for clinician and/or Assistive Technology Professional in-person engagement for complex rehab wheelchairs and accessories to be met through the use of remote technology.
17. Allow all patients with chronic conditions to have out of network benefits for medically critical DMEPOS equipment and supplies.
18. Require a temporary moratorium on reductions in fee schedules for DMEPOS providers to preserve access to care.

We appreciate your prompt attention to these issues. Many providers in the DME industry are already implementing these types of measures to ensure that beneficiaries are able to access appropriate medical care in their homes. Communities across the nation are dealing with a rapidly accelerating crisis that will test our health care systems like never before. DME providers are in a unique position to provide home ventilation and oxygen therapy that can make a significant difference in alleviating hospital overloads and facilitate the ability of beneficiaries to recover in their homes, the safest and most cost-effective site of care: the home.

These policy recommendations will both allow our industry to make the strongest possible contribution in both directly supporting patients impacted by COVID-19, while also reducing the need for hospitalizations and clinical interventions for seniors, individuals with acute conditions, and other vulnerable patient cohorts. The DME community has a long record of providing compassionate and effective care under challenging conditions, and we are again ready to do our part to protect our nation in this unprecedented emergency.

On behalf of the American Association for Homecare and the DME community, as well as the 154 companies and stakeholder groups signing onto this letter (noted below), I thank you for all of the efforts being made related to access to medically necessary equipment, supplies and medication for beneficiaries during the COVID-19 outbreak. AAHomecare welcomes the opportunity to discuss any of the requests outlined above. Please let me know if there is any other information we can provide.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Ryan", is positioned above the typed name.

Tom Ryan
President and CEO
American Association for Homecare

Supporting Organizations

AdaptHealth, LLC
Apria Healthcare
Lincare Holdings Inc.
Numotion

AeroCare
Hoveround Corporation
National Seating & Mobility
Rotech Healthcare, Inc.



Acclaimed Health Care
Atlantic Coast Medical Equipment Suppliers Assoc.
ACU-Serve Corp
Alabama Durable Medical Equipment Assoc.
Air-Way Medical
Allegiance Group
Alternacare
American Medical Distribution, Inc.
Andrew Brown's Home Health Care Center
Assoc. for TN Home Oxygen Medical Equip. Services
Best Home Medical
Breathe Easy Home Medical
Cair Respiratory LLC
Cape Medical Supply
Carolina's Home Medical Equipment
Colonial Medical Supplies
Community Surgical Supply of Tom's River, Inc.
COPD Respiratory & Mobility Solutions
Dik Healthcare
Dynamic Healthcare Services
DVB Ind., d.b.a. G&L Medical Equipment & Supplies
El Medical, Inc.
Florida Alliance of Home Care Services
Fairmeadows Home Health Center, Inc.
Genesis Respiratory Services
Georgia Assoc. of Medical Equipment Suppliers
Gerould's Professional Pharmacy, Inc.
Great Lakes Home Medical Services Ass.
Health Aid of Ohio, Inc.
Health Care Reimbursement Solutions, Inc.
Home Care Alliance of Virginia, Inc.
Hometown Medical
Invacare Corporation
Kaup Pharmacy
Larry's Home Oxygen, Inc.
Kentucky Medical Equipment Suppliers Ass.
Lockport Home Medical
McAbee Medical Inc,
Active Healthcare
ActivStyle
AEL Adapting Engineering Lab
Aeroflow Healthcare
Airway Oxygen
Alpine Home Medical Equipment
American HomeCare Equipment
Analytix
Barnes Healthcare Services
Baya Medical
BioDerm, Inc.
C.N.Y. Medical Products
CAIRE Inc.
Cardinal Health
Children's Home Medical Equipment
CPAP & More
Cutter Cares LLC
DASCO Home Medical Equipment
Dressen Medical Supply
East Alabama HomeMed, LLC
ECS North
Family Medical Supply
Finley-Hartig Homecare
Freedom HME
Grace Home Respiratory
Hampton Homecare
Handi Medical Supply
Hawaiian Islands Medical Corp
Health System Services
Healthcare Equipment, Inc.
Home Medical, Inc.
Hometown Respiratory
Jane's Healthcare Management
Keene Medical Products, LLC
Liberty Medical Specialties, Inc.
LifeH2H
Lorraine Surgical Supply of WV
McKesson Corporation



Midwest Assoc. of Medical Equipment Suppliers
Med Response Inc.
Merits Health Products, Inc.
MJE Consultants, LLC
attery
Monitor Medical
Maryland National Capital Homecare Assoc.
National Coalition for Assistive & Rehab Technology
Nevada Assoc. of Medical Products Suppliers
Northeast Medical Equipment Providers
Ohio Assoc. of Medical Equipment Services
Olympic Pharmacy & Healthcare Services
Pennyrile Home Medical
Physicians Choice Medical
PMR LLC
PPM Fulfillment
Pride Mobility
ProMedica
Pulmonary Partners
Quinlan's Pharmacy & Medical Equipment
Reliable Medical Supply, Inc.
Respicare DME, Inc.
RSVP Homecare
Sego's Home Medical Equipment
Sleep 8
Solarus Medical
Southwest Medical Equipment Suppliers Assoc.
Stephens Pharmacy/Northeast Med-Equip
The Care Group
Thrive Skilled Pediatric Care
Triumph Home Health Supplies, Inc.
URS Medical
Van's Medical Equipment of Lakeland, LLC
VieMed
Wellspect Health Care
WinCare, Inc
3M

Med Inc.
Medical Homecare Supply
Millennium Respiratory Services
MK B

MRS Homecare
My Best Homecare
Nestle' Health Science
Ocean Breeze Infusion Care, Inc
PA Assoc. of Medical Suppliers
Parachute Health
Pediatric Home Services
Penrod Medical Equipment
Piedmont Medical Solutions
Poinsett Medical
Prescription Center
Prochant
Protech Home Medical
Provider Plus
RAC Assoc, d.b.a. SpecialCare
ResMed
Rezk Medical Supply
Schraders' Medical Supply, Inc.
Sentido Health
Solara Medical Supplies
Soundview Medical Supply
Spectrum Medical, Inc.
SuperCare Health
The PromptCare Companies
Trace Medical
UNC Homecare Specialists
Valmar Surgical Supplies Inc.
VGM Group
W & B Plaza Pharmacy and DME
West Plains Health Service, Inc.
Wound Care Resources, Inc.