

Open Meeting: Enteral Nutrition, Osteogenesis Stimulators, Parenteral Nutrition, and Seat Lift Mechanisms

Meeting Date & Time:	March 23, 2023, 10:00 a.m. ET
Facilitator:	Jody Whitten
Location:	Virtual Meeting

JODY WHITTEN (0:00): All right, well hello and welcome to the DME MAC Open Meeting.

My name is Jody Whitten, from the Noridian Medical Policy Team, and I'd like to thank everyone for taking the time to join us today to discuss our four Proposed Local Coverage Determinations, also known as LCDs. The four Proposed LCDs we will be discussing today are Enteral Nutrition, Osteogenesis Stimulators, Parenteral Nutrition and Seat Lift Mechanisms.

We have one person scheduled to present their comments today, thank you William, and we have already checked your audio, which seems to be working without any background noise. So, with that said, I'd like to turn the call over to Dr. Ballyamanda for her opening remarks, Dr. Ballyamanda.

DR. SMITHA BALLYAMANDA (0:53): Thank you so much, Jody. Good morning, everyone. We welcome you to our virtual open meeting.

Today, we'll be soliciting public comments regarding the Proposed Enteral Nutrition and Parenteral Nutrition Local Coverage Determinations. Please note that we did not have any speakers registered for our other Proposed LCDs, Osteogenesis Stimulators and Seat Lift Mechanisms.

My name is Dr. Smitha Ballyamanda and I am with Noridian Healthcare Solutions, the Jurisdiction A DME MAC. Also from Noridian is Dr. Angela Jenny from Jurisdiction D. Representing CGS Administrators are Dr. Sunil Lalla and Dr. Robert Hoover from Jurisdictions B and C, respectively. Moderating the phone lines and keeping our speakers on track, speaker on track, is Jody from the Medical Policy Team at Noridian.

We look forward to your comments regarding the Enteral and Parenteral Nutrition LCDs. Please write these comments and send them to us via e-mail at ENTLCDComments@cgadmin.com for Enteral and PENRecon@noridian.com for Parenteral. Additionally, if listeners have comments on either proposed LCD not being discussed, please send those comments to OsteoRecon@noridian.com for Osteogenesis Stimulators and SeatLiftRecon@noridian.com for Seat Lift Mechanisms. Details for submitting comments are also available on the DME MAC websites. Please remember that we can only respond to written comments. These comments are due by 5 PM Eastern Time on Saturday, March 25th, 2023.

Also, we will record the meeting today, which will be posted on the DME MACs websites. You are giving your consent to use, to the use of your recorded voice and comments by signing into this meeting. Please be careful about sharing any personal health information in your verbal comments.

We have one commenter, who has pre-registered to speak. We are only allowing registered commenters to speak at today's meeting, but anyone can submit written comments to the email addresses I mentioned earlier. For our speaker today, we ask that you please introduce yourself, the organization that you represent, and any conflicts of interests that you may have with this topic.

For those who are listening, please mute your phone line and computer, if applicable. For those on your phone, please do not place this call on hold, because we will be forced to listen to background music. Instead of placing the call on hold, we suggest that you please end the call and dial back into the conference when you're ready.

Speakers should be prepared to begin their comments immediately after being called upon.



Now I will give a brief overview regarding the policies. The DME MACs are proposing to add modifiers to four LCDs, with the elimination of the CNM and DIF, we propose adding modifiers to help with claims processing and claims submission.

The suggested modifier updates are as follows: Enteral Nutrition: Draft LCD 38955 and Osteogenesis Stimulators Draft LCD L33796, Parenteral Nutrition Draft LCD Draft DL38953, Seat Mechanisms Draft LCD DL33801. All LCDs we're proposing the addition of the GA, GY, GZ, and KX modifiers for coding information section of the LCD.

Now I'll turn the microphone back over to our moderator, Jody, from Noridian. Thank you.

JODY WHITTEN (5:20): Thank you, Dr. Ballyamanda. As mentioned, we have one individual to present their comments. The time limitation today will be set at 30 minutes for, again, our one and only, and if you need it, I'll give you a one minute warning to let you know that you're coming close to your, the end of your time. With that said today, Mr. William Noyes, your line is now open and you have 30 minutes.

WILLIAM NOYES (5:50): Alright, thank you Jody Whitten and Medical Directors. Good morning.

DR. SMITHA BALLYAMANDA (5:57): Good morning Bill.

WILLIAM NOYES (6:00): I appreciate the opportunity to comment. I think you know, I'm the Senior Vice President of Reimbursement Policy for the National Home Infusion Association. I do not have any conflicts of interest to report. NHIA is a trade association that represents companies that provide infusion therapy to patients in their homes, as well as companies that manufacture and supply infusion and specialty pharmacy products.

As the lead voice for the home and alternate site infusion community, we appreciate the opportunity to comment on these proposed LCDs. NHIA members focused on home infusion, which has limited coverage under the DMEPOS program, specifically under the External Infusion Pumps policy, the Intravenous Immune Globulin policy, as well as the Enteral and Parenteral Nutrition policies, so my comments here today are really limited to those Enteral and Parenteral Nutrition policies.

In the past, the majority of the policies that we've billed under required the DME information forms, the DIFs, and we had little to no experience with use of the KX modifier. Upon seeing this proposal, I spoke with a number of suppliers that bill other policies that have long use the KX modifier to indicate beneficiaries meet qualifying coverage criteria, and they report that it works smoothly. I've also had three weeks to monitor the new requirements under the External Infusion Pumps policy, requiring the same modifiers that are proposed for the Enteral and Parenteral Nutrition, and they report that it's working well, that claims are going through, being adjudicated. They're seeing few denials.

NHIA is not opposed to these policy changes. We do ask for education if and when the time comes that modifiers are required to be reported in a specific order. In some cases there are many, four or more modifiers required for particular items, and we would also ask that if the supplier receives a CO denial stating that the procedure code is inconsistent with the modifier used, or a required modifier is missing, that the MACs be willing to provide education and share details with suppliers about what the modifier issue specifically is. That's, that's the only real issue I've seen come up with suppliers on the EIP (External Infusion Pumps) side since the rollout of the KX modifier in March.

So, you won't have to give me a one minute warning. Again, we're not opposed to these changes and appreciate the opportunity to comment. Thank you.

JODY WHITTEN (9:06): Thank you for your comment. I didn't think we need that one minute warning, but I thought I'd just say it just in case. It does, this does conclude our verbal comments for the four proposed LCDs. I will now turn the call back over to Dr. Ballyamanda for her closing remarks.

DR. SMITHA BALLYAMANDA (9:23): Bill, thank you so much for your comments and time today. We thank, thank you to you and anyone that is listening today. Once again, please remember to send your comments in, in writing to the appropriate e-mail address. As another reminder, the comment period will end on Saturday, March 25th, 2023.

Once we have considered and collated all of the comments received during the open period, open comment period, we will consider any changes necessary as a result of the comments received, and then post Final LCDs along with a response to the comments document.

The final LCD will take effect a minimum of 45 days following the posting of the final LCD. For any updates, please refer to the DME MAC website. I want to thank everybody for participating today.

We will formally adjourn this meeting now. Have a wonderful day.