

Jurisdiction B Council Action Items November 17, 2011

1. Council asked if National Government Services could publish a list of HCPCS codes for each category that the Interactive Voice Response (IVR) system uses when checking for same/similar equipment.

Provider Outreach & Education has drafted a Same/Similar Reference Guide. The resource guide is currently being reviewed by internally by internal operational areas prior to publishing. A listserv announcement will be sent out when the resource guide becomes available. An update will be provided at the next meeting.

OPEN

2. Council asked if an enhancement could be added to Connex which would allow suppliers to receive both the beneficiary address along with the jurisdiction they reside in.

The Connex team is currently researching this issue. The Connex team did not have an update regarding this issue. An update will be provided at the next meeting. **OPEN**

3. If beneficiary wants to purchase an item that Medicare billing requirements indicate must be rented can a DMEPOS supplier bill the item as a purchase and receive a PR denial?

No. The Centers for Medicare & Medicaid Services assigns each HCPCS to a payment category. If a HCPCS code is assigned to the capped rental payment policy, Medicare payment is made on a rental basis only, although the supplier is required to transfer title to the equipment to the beneficiary after the capped rental payment period (13 months of continuous use) ends. If a capped rental item is billed to Medicare as a purchase, the claim will be rejected for incorrect billing. The DME MAC cannot issue a PR denial in these situations.

Council requested that this action item be submitted to CMS for consideration.

Update: *This is not an issue that can be addressed by CMS because MSP guidelines are based upon Federal laws and regulations. The following information may be found in the Jurisdiction B DME MAC Supplier Manual, Chapter 5 and is consistent with the guidelines provided by the other three DME MACs.*

Medicare Secondary Payer on Rental/Purchase Items:

*Medicare as secondary payer can, under no circumstances, pay more than **what** Medicare would have paid as a primary payer. If the primary insurance pays for the **lump sum purchase of an item that Medicare will only pay for as a rental (capped rental items, oxygen)**, Medicare cannot make a secondary payment. Medicare would not make a primary payment; therefore, a secondary payment could not be made*

for the lump sum purchase of such items. In the above instance, it is not appropriate to execute an Advance Beneficiary Notice of Noncoverage (ABN). CLOSED

- 4. RiverTrust has stated that they are more than 3 month behind in processing redetermination requests due to a dramatically increased workload. This is adding a substantial amount of time for our outstanding claims. We have also had issues where, when we contact RiverTrust about an open reconsideration, we have been told that a decision was made, and a letter mailed - which we never received - and now we are out of time to file the next level of appeals. We know this is not an area that National Government Services can directly address, but can National Government Services help us find someone at RiverTrust or CMS who will work with us to resolve QIC issues?**

Revised New Qualified Independent Contractor (QIC) - C2C Solutions, Inc.

Reconsideration requests, the second level in the Medicare appeals process, are processed by the Qualified Independent Contractor (QIC), who is currently RiverTrust Solutions. Effective November 15, 2011, C2C Solutions, Inc. will take over the QIC contract and begin processing reconsideration requests for all four of the Durable Medical Equipment Medicare Administrative Contractors (DME MACs).

All requests for reconsideration received by RiverTrust Solutions, on or after November 15, 2011 will be forwarded to the new Qualified Independent Contract (QIC). All requests for reconsideration received on or before November 14, 2011 will continue to be processed by RiverTrust Solutions.

Effective, November 15, 2011 DMEPOS suppliers should send all requests for reconsideration to C2C Solutions, Inc. Below is the address and contact information for C2C Solutions, Inc.

C2C Solutions, Inc.
Attn: DME QIC
P.O. Box 44013
Jacksonville FL 32231-4013

Web site: www.C2Cinc.com

C2C Solutions, Inc. also holds the QIC contract for Medicare Part B Reconsiderations in the Northern Jurisdiction. The DME MACs and C2C Solutions, Inc. will strive to make this transition as seamless as possible for DMEPOS suppliers.

All requests for reconsideration received on or before 11/14/11 will continue to be worked by RiverTrust. RiverTrust will also continue to work their current pending inventory on a first in, first out basis so that the oldest cases are processed first. Council members should watch our listserv for future updates regarding the transition from RiverTrust to C2C Solutions, Inc. CLOSED