**Inquiry ID Number: 12075**

Dear Jeff King,

Thank you for your inquiry to the Pricing Data Analysis and Coding (PDAC) contractor on October 14, 2020 with questions about the L1686 and is there a split code reference to this for OTS fitting?  What will constitute minimal self-adjustment? Are existing PDAC letters going to be re-evaluated to specify existing braces are upholding the description? Does the dictation have to state what modifications were done to justify the more than minimal self-adjustment criteria. Does a CFO qualify as a person with specialized training?

1) Regarding L1686 - Is there a split code reference to this for OTS fitting?

The only codes that meet the minimal self-adjustment definition are listed as Off-the=-Shelf Codes on the corresponding HCPCS Code Table.  The HCPCS Code table is at the end of the advisory article.

L1686 is not part of the HCPCS Code Table from the advisory article Correct Coding - Definitions Used for Off-the-Shelf versus Custom Fitted Prefabricated Orthotics (Braces) - Revised

[**https://www.dmepdac.com/palmetto/PDAC.nsf/DID/K832D7NYR3**](https://www.dmepdac.com/palmetto/PDAC.nsf/DID/K832D7NYR3)

L1686's code narrative includes the phrase "INCLUDES FITTING AND ADJUSTMENT". Historically, this phrase meant the device requires expertise to perform the fitting and adjustments.  It indicates a product that would require an individual with specialized training in the fitting and adjustment of the device.

2) What will constitute minimal self-adjustment?

The term "minimal self-adjustment" is defined by 42 CFR §414.402 as an adjustment the beneficiary, caretaker for the beneficiary, or supplier of the device can perform and that does not require the services of a certified orthotist (that is, an individual who is certified by the American Board for Certification in Orthotics and Prosthetics, Inc., or by the Board for Orthotist/Prosthetist Certification) or an individual who has specialized training. For example, adjustment of straps and closures, bending or trimming for final fit or comfort (not all-inclusive) fall into this category.

The "minimal self-adjustment" is defined in the advisory article Correct Coding - Definitions Used for Off-the-Shelf versus Custom Fitted Prefabricated Orthotics (Braces) - Revised  (see link below)

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3) Are existing PDAC letters going to be re-evaluated to specify existing braces are upholding the description?

Devices listed L1686 on the Product Classification List with a current effective date and not end dated will be considered to meet the requirements for L1686.

4) Does the dictation have to state what modifications were done to justify the more than minimal self-adjustment criteria.

This question needs to be addressed by one of the DME MACs (CGS Administrators or Noridian Healthcare Solutions).  This is a medical records documentation question which is outside the scope of the PDAC.

5) Does a CFO qualify as a person with specialized training?

No.  A CFO would not be considered to have the " expertise of a certified orthotist or an individual who has specialized training in the provision of orthotics"   See the definition of more than minimal self-adjustment below:

*More than minimal self-adjustment is defined as changes made to achieve an individualized fit of the item that requires the expertise of a certified orthotist or an individual who has specialized training in the provision of orthotics in compliance with all applicable Federal and State licensure and regulatory requirements. A certified orthotist is defined as an individual who is certified by the American Board for Certification in Orthotics and Prosthetics, Inc., or by the Board for Orthotist/Prosthetist Certification.*

The "more than minimal self-adjustment" is defined in the advisory article Correct Coding - Definitions Used for Off-the-Shelf versus Custom Fitted Prefabricated Orthotics (Braces) - Revised  (see link below)

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Healthcare Common Procedure Coding System (HCPCS) codes and all products classified by the PDAC are found on the Durable Medical Equipment Coding System (DMECS) located at [www.dmepdac.com](http://www.dmepdac.com/" \t "_blank). This application is available seven days a week, 24 hours a day.

If you have questions, please contact the PDAC HCPCS Helpline at (877) 735-1326 during the hours of 9:30 a.m. to 5:00 p.m. ET, Monday through Friday. You may also visit our [website](https://www.dmepdac.com/" \t "_blank) to chat with one of our representatives or select the Contact Us button at the top of the page for email, FAX or postal mail information.

Sincerely,

**Pricing, Data Analysis, and Coding Contract (PDAC)**

Palmetto GBA, LLC

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