

**HEALTHCARE COMMON PROCEDURE CODING SYSTEM (HCPCS) LIST FOR
PROSTHETIC LIMB AND/OR CUSTOM ORTHOTIC DEVICE PRESCRIPTION**

- 1. REASON FOR ISSUE:** This Veterans Health Administration (VHA) Directive establishes the policy and responsibilities for the development of the Healthcare Common Procedure Coding System (HCPCS) list for prosthetic limb and/or custom orthotic device prescription.
- 2. SUMMARY OF CONTENTS:** This new VHA Directive clarifies the authority and responsibilities of VHA staff in developing the HCPCS list for prosthetic limb and/or custom orthotic device prescription, and eliminates the HCPCS list development process from the contract vendors who provide HCPCS list for work they are contracted to provide.
- 3. RELATED ISSUES:** None.
- 4. RESPONSIBLE OFFICE:** Rehabilitation and Prosthetic Services (10P4R) is responsible for the contents of this VHA Directive. Questions may be referred to the 10P4R at 202-461-0389.
- 5. RESCISSIONS:** None.
- 6. RECERTIFICATION:** This VHA Directive is scheduled for recertification on or before the last working day of December 2018.

Robert A. Petzel, M.D.
Under Secretary for Health

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HEALTHCARE COMMON PROCEDURE CODING SYSTEM (HCPCS) LIST FOR PROSTHETIC LIMB AND/OR CUSTOM ORTHOTIC DEVICE PRESCRIPTION

1. PURPOSE: This Veterans Health Administration (VHA) Directive establishes the policy and responsibilities for the development of Healthcare Common Procedure Coding System (HCPCS) list for prosthetic limb and/or custom orthotic device prescription. This Directive changes the current practice of contract vendors developing the HCPCS list for work they are contracted to provide. **AUTHORITY:** 38 U.S.C. 7301, 8123.

2. BACKGROUND: The procurement of a prosthetic limb and/or custom orthotic device is a complex process beginning with the development of the prescription. Upon receipt of the prescription, the review of appropriate HCPCS list is required to equate the prescription to the specific products that make up the prosthetic limb and/or custom orthotic device. The process for developing the HCPCS list varies widely across VHA and should be better defined, as indicated in two recent Office of Inspector General (OIG) reports (OIG Report 11-02254-102, “Audit of the Management and Acquisition of Prosthetic Limbs”, and OIG Report 11-02138-116, “Healthcare Inspection: Prosthetic Limb Care in VA Facilities”). This Directive establishes a uniform method to improve the prosthetic limb and/or custom orthotic device prescription process by clearly delineating roles and responsibilities of VHA staff involved in identifying the appropriate HCPCS list for prosthetic limb and/or custom orthotic device prescription.

3. POLICY: It is VHA policy that VHA Prosthetic and Sensory Aids Service has the authority for the development of the HCPCS list for prosthetic limb and/or custom orthotic device prescription.

4. RESPONSIBILITIES:

a. **Deputy Under Secretary for Health for Policy and Services.** The Deputy Under Secretary for Health for Policy and Services is responsible for managing the contents of this Directive and providing necessary updates/revisions.

b. **Deputy Under Secretary for Health for Operations and Management.** The Deputy Under Secretary for Health for Operations and Management is responsible for ensuring the implementation of this Directive.

c. **Veterans Integrated Services Network Director.** Each Veterans Integrated Services Network (VISN) Director is responsible for providing oversight of the HCPCS list development process for prosthetic limb and/or custom orthotic device prescriptions within the VISN, and ensuring adherence to this Directive.

d. **Medical Facility Director.** Each medical facility Director is responsible for:

(1) Ensuring a Veteran–centric approach to the development of HCPCS list for prosthetic limb and/or custom orthotic device prescriptions.

(2) Ensuring certified VHA Prosthetists or Orthotists participate in the clinic at the time of patient evaluation.

(3) Ensuring that only authorized VHA Prosthetic and Sensory Aids Service staff develop an appropriate HCPCS list for prosthetic limb and/or custom orthotic device prescriptions in a timely manner.

(a) VHA Prosthetists and Orthotists must develop HCPCS lists for all prosthetic limb and custom orthotic device prescriptions, or VHA Prosthetic Representatives may develop HCPCS lists in consultation with VHA Prosthetists and Orthotists. Contract vendors are not to be engaged in the development of HCPCS lists for any prosthetic limb and/or custom orthotic device prescriptions.

(b) VA medical facilities without a VHA Prosthetist or Orthotist must utilize the expertise of a VHA Prosthetist or Orthotist within their VISN or other VISNs to develop HCPCS lists.

(c) HCPCS lists must be developed in the clinic at the time of patient evaluation, except in circumstances where a VA Prosthetist or Orthotist from another VA medical facility must be utilized and is not available to attend the clinic. In those circumstances, HCPCS lists must be developed no more than 2 business days after the clinic date.

(4) Ensuring appropriate L Code usage for Not Otherwise Classified (NOC) Orthotic and Prosthetic Limb Components. **NOTE:** *Centers for Medicare and Medicaid Services (CMS) guidelines and policies related to the use and application of HCPCS L Codes for orthotic and prosthetic devices should be followed.*

(a) Orthotic and prosthetic components that do not have or have not been assigned an L Code are considered to be NOC L Codes.

(b) Only a single NOC code is to be utilized for the component. No other L Code will be accepted in conjunction with the NOC code.

(5) Ensuring contract prices adhere to the awarded contract. Only the Contracting Officer may authorize purchases above the micro-purchase threshold and must determine prices to be fair and reasonable. The Contracting Officer Representative (COR) or authorized Ordering Official is responsible for reviewing vendor invoices and verifying pricing is the negotiated amount. **NOTE:** VA may reimburse for products classified as NOC L Codes L0999, L2999, L3999, L5999, L7499, and L8499 until CMS formally classifies and/or assigns an L Code to the subject products.

5. REFERENCES:

a. OIG Report "Audit of the Management and Acquisition of Prosthetic Limbs." March 8, 2012 (11-02254-102).

b. OIG Report "Healthcare Inspection: Prosthetic Limb Care in VA medical facilities." March 8, 2012 (11-02138-116)

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c. Deputy Under Secretary for Health for Operations and Management Memorandum regarding Medical L Code Usage for Orthotic and Prosthetic Limb Components – Not Otherwise Specified/Classified (NOC), February 20, 2013.