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American Board for Certification in Orthotics, Prosthetics & Pedorthics, Inc.

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June 17, 2014

Paul Hughes, M.D.
Medical Director
NHIC, Corporation
DME MAC, Jurisdiction A
75 Sgt. William B. Terry Drive
Hingham, MA 02043

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RE: CR 8730

Dear Dr. Hughes:

The American Board for Certification in Orthotics, Prosthetics and Pedorthics, Inc. (ABC) is a nationally recognized credentialing board providing certification and accreditation services to the orthotic, prosthetic and pedorthic (O&P) professions. We are writing to you concerning the recent CMS Change Request (CR 8730) which requires all DME MACs to revise programming edits so that North Dakota, Iowa and Pennsylvania are added to the logic in accordance with CRs 3959 and 8390.

Our request is focused on implementing the programming edits for DMEPOS Suppliers in Pennsylvania. Contained in CR 8730 is an implementation date of June 17, 2014. It has become clear that the Board of Medicine in Pennsylvania, who is responsible for issuing orthotic, prosthetic and pedorthic licenses, will not be able to process all of the applications they have received by this deadline. We have received a significant amount of feedback from providers in Pennsylvania that they submitted their application several months ago but have yet to receive their license.

We are requesting that the DME MAC for Region A delay implementation of the programming edits and allow orthotic and prosthetic suppliers time to obtain their license and submit a Change of Information (CMS 855S) form to the National Supplier Clearinghouse. We also request that you publish a notification of this delay to prevent potential disruption of services to Medicare beneficiaries. Thank you for the opportunity to provide this information. Please do not hesitate to contact me if you have any questions.

Regards

Steve Fletcher cpo.

Stephen B. Fletcher, CPO, LPO
Director, Clinical Resources