

Dear PMC Members:

Attached are comments that the PMC submitted to the Office of Management and Budget (OMB) on the data collection and paperwork burdens associated with the final rule that implemented the face-to-face examination requirement (CMS-3017-IFC). As part of the rule, the Centers for Medicare and Medicaid Services (CMS) eliminated the certificate of medical necessity (CMN) for filing power mobility device (PMD) claims.

In their comments, the PMC calls on OMB to instruct CMS to reconsider their burden estimate under the rule and establish a standardized template as an alternative to the current undefined, amorphous documentation requirement.

The PMC recognizes that the current documentation requirement is administratively burdensome to both providers and the physicians they work with. The PMC will continue to work with CMS, the OMB and other stakeholders to reduce the paperwork burdens and increase the objectivity in the Medicare PMD claims process.

As always, feel free to contact me if you have any questions or need further information.

Eric