

PROVIDER COMPLIANCE TIPS FOR COMMODOES, BED PANS, & URINALS



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UPDATES

- Replaced the earlier year's data with 2019
- Updated Reasons for Denials
- Updated requirements in "To Prevent Denials"

INTRODUCTION

This publication is meant to educate providers on coverage and proper billing for commodes, bed pans, urinals, and their associated accessories.

PROVIDER TYPES AFFECTED

Physicians and other practitioners who write prescriptions for commodes, bed pans, urinals, and Durable Medical Equipment (DME) suppliers

BACKGROUND

The Medicare Fee-for-Service (FFS) improper payment rate for commodes, bed pans, and urinals for the 2019 reporting period was 75 percent, which is a projected improper payment amount of more than \$7.7 million.

REASONS FOR DENIALS

For the 2019 reporting period, insufficient documentation accounted for 81.8 percent of improper payments for commodes, bed pans, and urinals. Other types of errors included other errors (16.1 percent) and no documentation (2.1 percent).

TO PREVENT DENIALS

The conditions of coverage that a patient must meet if payment for the rental or purchase of the DME is allowed are:

- **Commodes: Covered** - If a patient is confined to a bed or room, then Medicare covers the commode.

Note: The term "room confined" means that the patient's condition is medically contraindicated if the patient leaves the room. Generally, Medicare doesn't factor the accessibility of bathroom facilities in

this determination, but Medicare may equate the confinement of a patient to a home where there are no toilet facilities in the home to room confinement. Also, Medicare may make payment if a patient’s medical condition confines them to a floor of a home that has no bathroom on that floor.

Medicare covers a commode when the patient is physically incapable of using regular toilet facilities. This would occur in these situations:

- The patient is confined to a single room
- The patient is confined to one level of the home environment with no toilet on that level
- The patient is confined to the home with no toilet facilities

Medicare covers an extra wide and heavy duty commode chair (E0168) for a patient who weighs 300 pounds or more.

Medicare covers a commode chair with detachable arms (E0165) if the detachable arms feature is necessary to transfer the patient, or if the patient’s body requires extra width.

- Bed Pans (autoclavable hospital type): Covered - Medicare covers bed pans if the patient is bed-confined.
- Urinals (autoclavable): Covered - Medicare covers urinals if the patient is bed-confined, hospital type.

To justify payment for commodes, bed pans, and urinals, suppliers meet these requirements:

- Prescription: The supplier must receive a Standard Written Order (if applicable) before a health care professional submits a claim
- Medical Record Information (including continued need and use, if applicable)
- Correct Coding: Medicare will deny incorrectly coded claims
- Proof of Delivery: Proof of delivery (POD) is a Supplier Standard and DMEPOS suppliers must keep POD documentation in their files. The Medicare contractor can request POD documentation, and suppliers must make the documentation available upon request. Medicare will deny all services that don’t have appropriate POD from the supplier as not reasonable and necessary.

RESOURCES

Table 1. Commodes, Bed Pans, and Urinals Resources

RESOURCE	WEBSITE
2019 Medicare Fee-for-Service Supplemental Improper Payment Data	https://www.cms.gov/files/document/2019-medicare-fee-service-supplemental-improper-payment-data.pdf
Complying with Medical Record Documentation Requirements	https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/CERTMedRecDoc-FactSheet-ICN909160.pdf

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RESOURCE	WEBSITE
Local Coverage Article: Standard Documentation Requirements for All Claims Submitted to DME MACs (A55426)	https://www.cms.gov/medicare-coverage-database/details/article-details.aspx?articleid=55426&ver=76&-Date=&DocID=A55426&bc=hAAAABIAAAAA&
Local Coverage Determination (LCD) Commodes (L33736)	https://www.cms.gov/medicare-coverage-database/details/lcd-details.aspx?LCDId=33736&ver=20&DocID=L33736&bc=iAAAAIAAAAA&
National Coverage Determination (NCD) for Durable Medical Equipment (DME) Reference List (280.1)	https://www.cms.gov/medicare-coverage-database/details/ncd-details.aspx?&NCDId=190&NCD-Sect=280.1

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