



## COMPLIANCE ALERT - Items Included in the Base

### ATTN: Branch Leaders, ATPs, CSS, Funding, and B&C Team Members

At the beginning of this year, we started a compliance audit process where we select random work orders across all regions looking for 'out of compliance' issues. As part of this process, we also provide guidance where employee education and/or reinforcement is advised.

### Areas of Focus

Some common areas where we see work orders 'out of compliance' are **convenience items, upgrades, and color options**. These items cannot be Included with base or other billable components. Most payers will not pay for these items and as a result they will generally either not be approved or are self-pay for the client. If you believe there is an exception for a particular payer that allows items to be included with the base, please be certain to verify by referring to the UPD or other resources to make certain the exception applies in your case (Payer Relations, Compliance, etc.). In addition, if a write-off for convenience items, upgrades, and/or color options are requested, the request should first be approved by the corresponding Regional Area Director and then sent to the Compliance Department for review and approval.

### Compliance Risk

An approval to write-off or not charge for convenience items or upgrades will be in extremely limited circumstances as **providing anything of value to a client can be considered an inducement**. Inducements are not compliant with law or regulation and can put NSM in jeopardy of significant fines and penalties being levied against us by the States, the Department of Justice, the Department of Health and Human Services and other government agencies.

Below are upgrade and convenience items that are NOT typically considered medically necessary. *This is not a comprehensive list and there are likely other items to consider for each payer.*

### Upgrades

- Tires
- Hand Rims
- Designer Spoke Guards
- Spynergy Wheels
- Carbon Fiber Side Guards & Backs
- Upgraded Forks
- Titanium Frames



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### **Convenience Items**

- Canopy (Headrest Cover)
- Backpack
- Utility Bag
- Utility Hook
- Wheelchair Travel Bag
- Medical Necessities Bag
- Mosquito Netting
- Under Seat Storage Basket
- Seat Pouch -- of any description
- Phone Holder
- Cup Holder
- USB Charger
- Accessory Bar
- Glove Box
- Embroidery of any kind -- name, symbol, etc.
- Safety Flags
- Light Packages
- Back Up Mirrors

We encourage everyone to know what each payer allows before submitting work orders, but there are always scenarios that come up (i.e. transit tie downs), so if you have any questions or we can help in any way, please let us know. As always, we appreciate all of your support to ensure we are compliant at NSM. If you have any questions, contact [Compliance@nsm-seating.com](mailto:Compliance@nsm-seating.com).