

January 10, 2017

ABILITY DYNAMICS LLC  
1236 WEST SOUTHERN AVENUE # 101  
TEMPE AZ 85282

**Re: Assigned HCPCS Codes for DME Billing**

**Xref: 60935480**

RUSH ROVER	ABILITY DYNAMICS LLC	L5981
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Dear J Blount Swain:

The Pricing, Data Analysis, and Coding (PDAC) contractor has reviewed the product(s) listed above and has approved the listed Healthcare Common Procedure Coding System (HCPCS) code(s) for billing the four Durable Medical Equipment Medicare Administrative Contractors (DME MACs).

The PDAC Contractor provides coding assistance to manufacturers to ensure proper coding of Durable Medical Equipment, Prosthetics, Orthotics, and Supplies (DMEPOS). The PDAC publishes coding decisions based on the coding guidelines established by the Local Coverage Determinations (LCDs) and associated Policy Articles and any related Advisory Articles established by the DME MACs. All products submitted to the PDAC for a coding verification review are examined by coders and professionals following a formal, standardized process.

The PDAC has reviewed the above listed product(s). Based on this review and application of DME MAC policy, the HCPCS code(s) listed below should be used when billing the DME MACs:

**L5981** - All Lower Extremity Prostheses, Flex-Walk System Or Equal

The Ability Dynamic's foot model RUSH ROVER coding verification application requested two codes, in combination, be assigned to this product:

- L5981 (ALL LOWER EXTREMITY PROSTHESES, FLEX-WALK SYSTEM OR EQUAL)
- L5986 (ALL LOWER EXTREMITY PROSTHESES, MULTI-AXIAL ROTATION UNIT ('MCP' OR EQUAL)

The RUSH ROVER prosthetic foot has the following characteristics:

- It is a composite material foot with the optional connectors that allow it to be utilized for Endoskeletal and possibly Exoskeletal as well.
- It has a two-part keel; each part is constructed of a continuous monolithic laminate. One keel is full length from heel to toe. The second keel is shorter and cantilevers over the sole plate and provides the fastening point for a specialized 4-hole pattern connector. This keel locates the connector at the 1/3 distance of full length sole plate. It is adjoined at the heel with a gap between to two keels to allow sagittal plane bending. This design provides for energy storing function.
- Height of the connector is kept to a minimum to facilitate use for amputees with a long residual limb.
- There is no distinct component that is identifiable as a multi-axial rotation unit.
- There is no distinct component that is identifiable as a vertical loading pylon.
- Removable foot shell is included to cover keel and soleplate.

The HCPCS code assigned to the RUSH ROVER is based upon criteria set out in the code narrative, CMS and DME MAC coding instructions contained in bulletin articles, relevant Coding Guidelines and an analysis of the relevant predicate product(s). Predicate products is the term used to refer to the items that form the basis of the code descriptor and are important to provide context in interpretation of the code narrative and related coding guidelines. Based upon these sources, the requested HCPCS codes require:

- L5981 (ALL LOWER EXTREMITY PROSTHESES, FLEX-WALK SYSTEM OR EQUAL)

Code L5981 describes specific predicate product in the narrative, i.e. Flex-Walk system or equal. The Flex-Walk is an energy storing J-shaped design based on a monolithic carbon composite keel. At 4 inches the Flex-Walk system makes a 90+ degree bend anteriorly to form a flat coupling surface. It has a heel component bolted midway onto the J-shaped keel section. A 4-hole pattern coupling option is used. The Flex Walk is no longer available on the market. It has been replaced with the Vari-Flex which has similar characteristics with a similar shank height but has a straight shank. The foot shell may or may not include cosmetic details. Vari-Flex XC with Evo has been reviewed and assigned to L5981.

- L5986 (ALL LOWER EXTREMITY PROSTHESES, MULTI-AXIAL ROTATION UNIT ('MCP' OR EQUAL)

Code L5986 represents a component that is attached to a foot. The narrative “multi-axial rotation unit ('mcp' or equal)” describes a product that would allow motion in all three planes of motion: Coronal, Sagittal, and Transverse. This component may have distinct axles or pivots or some type of compressible material, like a firm rubber along with coupling surfaces, is attached to the foot and simulates anatomic ankle motions for the amputee while walking. This code does not describe multi-axial motion through multiple planes achieved as a result of the inherent flexibility of the foot design.

The RUSH ROVER does not have a distinct component that is identifiable as a multi-axial rotation unit; therefore, L5986 is not assigned.

Based upon the requirements described above, HCPCS code L5981 is assigned.

This decision applies to the application we received on October 14, 2016. If information submitted in that application has changed or were to change, it could impact our decision. Therefore, a new application would need to be submitted for HCPCS coding verification review. The coding assigned in this decision letter will be available on the Product Classification List (PCL) on the Durable Medical Equipment Coding System (DMECS) within ten (10) working days from the letter's date. The DMECS can be accessed on the PDAC website, [www.dmepdac.com](http://www.dmepdac.com). Please take the time to verify that this coding decision is correctly reflected in DMECS.

If you disagree with this decision, you may request a reconsideration within 45 days of the letter's date and provide evidence to substantiate a reconsideration of PDAC's original coding determination. To request a reconsideration, complete the Reconsideration Request form located on the PDAC website at <https://www.dmepdac.com/review/requesting.html>. If your request for a reconsideration is made after the 45-day time frame, it will require a new application and documentation to support the request.

It is the responsibility of manufacturers and distributors to notify the PDAC immediately of any changes involving their products, as listed on the PCL on DMECS. Further information for requesting updates to the PCL can be found on the PDAC website at <https://www.dmepdac.com/review/notifying.html>. It is also the responsibility of manufacturers and distributors to assure their websites and product marketing materials accurately reflect the product reviewed by the PDAC and the coding decision assigned.

An assignment of the HCPCS code(s) to product(s) is not an approval or endorsement of the product(s) by Medicare or Noridian Healthcare Solutions; nor does it imply or guarantee claim reimbursement or coverage.

If you have questions about policy, claim coverage or reimbursement, please contact the DME MAC for your jurisdiction. For other questions, contact the PDAC Contact Center at the address listed above or by telephone at (877) 735-1326. The Contact Center is open Monday through Friday from 8:30 a.m. to 4 p.m. CT.

Sincerely,

PDAC  
Noridian Healthcare Solutions, LLC  
[www.dmepdac.com](http://www.dmepdac.com)