Medicare Medical Policy

Walkers

MEDICARE MEDICAL POLICY NUMBER: 211

Effective Date: 10/1/2025

Last Review Date: 9/2025

Next Annual Review: 7/2026

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INSTRUCTIONS FOR USE: Company Medicare Medical Policies serve as guidance for the administration of plan benefits and do not constitute medical advice nor a guarantee of coverage. Company Medicare Medical Policies are reviewed annually to guide the coverage or non-coverage decision-making process for services or procedures in accordance with member benefit contracts (otherwise known as Evidence of Coverage or EOCs) and Centers of Medicare and Medicaid Services (CMS) policies, manuals, and other CMS rules and regulations. In the absence of a CMS coverage determination or specific regulation for a requested service, item or procedure, Company policy criteria or applicable utilization management vendor criteria may be applied. These are based upon published, peer-reviewed scientific evidence and evidence-based clinical practice guidelines that are available as of the last policy update. Coverage decisions are made on the basis of individualized determinations of medical necessity and the experimental or investigational character of the treatment in the individual case. In cases where medical necessity is not established by policy for specific treatment modalities, evidence not previously considered regarding the efficacy of the modality that is presented shall be given consideration to determine if the policy represents current standards of care.

The Company reserves the right to determine the application of Medicare Medical Policies and make revisions to these policies at any time. Any conflict or variance between the EOC and Company Medical Policy will be resolved in favor of the EOC.

SCOPE: Providence Health Plan, Providence Health Assurance, and Providence Plan Partners as applicable (referred to individually as “Company” and collectively as “Companies”).

PRODUCT AND BENEFIT APPLICATION

☒ Medicare Only

MEDICARE COVERAGE CRITERIA

IMPORTANT NOTE: More than one Centers for Medicare and Medicaid Services (CMS) reference may apply to the same health care service, such as when more than one coverage policy is available (e.g., both an NCD and LCD exist). All references listed should be considered for coverage decision-making. The Company uses the most current version of a Medicare reference available at the time of publication; however, these websites are not maintained by the Company, so Medicare references and their corresponding hyperlinks may change at any time. If there is a conflict between the Company Medicare Medical Policy and CMS guidance, the CMS guidance will govern.

Service	Medicare Guidelines
Walkers - General	Local Coverage Determination (LCD): Walkers (L33791)
Sully Walker (Powered Walking Aid) (E0152)	Local Coverage Article (LCA): Walkers - Policy Article (A52503) See Policy Guidelines for more information
Replacement of Walkers	Medicare Benefit Policy Manual, Chapter 15 – Covered Medical and Other Health Services, §110.2.C. – Replacement Standard Medicare DME replacement rules apply. Primary factors considered will include, but may not be limited to: • Whether the item is being rented or is member-owned; • Reason for replacement (e.g., change in medical condition, lost, stolen, worn out, damaged, etc.); • Whether or not the 5-year reasonable useful lifetime (RUL) for the device has been reached; **and** • Whether or not the item is still under manufacturer warranty. See Policy Guidelines below for specific information regarding replacement requests, as well as replacement supplies.

IMPORTANT NOTICE: While some services or items may appear medically indicated for an individual, they may also be a direct exclusion of Medicare or the member's benefit plan. Such excluded services or items by Medicare and member EOCs include, but are not limited to, services or procedures considered to be cosmetic, not medical in nature, or those considered not medically reasonable or necessary under *Title XVIII of the Social Security Act, §1862(a)(1)(A).* If there is uncertainty regarding coverage of a service or item, please review the member EOC or submit a pre-service organization determination request. Note that the Medicare Advance Beneficiary Notice of Noncoverage (ABN) form **cannot** be used for Medicare Advantage members. *(Medicare Advance Written Notices of Non-coverage. MLN006266 May 2021)*

POLICY CROSS REFERENCES

None

The full Company portfolio of Medicare Medical Policies is available online and can be accessed here.

POLICY GUIDELINES

REPLACEMENT REQUESTS

Replacement of Walkers

The definition of replacement can be found in the Medicare Benefit Policy Manual, Chapter 15 – Covered Medical and Other Health Services, §110.2.C. – Replacement, and refers to the provision of an identical or nearly identical item.

Replacement can be due to the following scenarios:

- **Irreparable *damage*** refers to a specific accident or to a natural disaster (e.g., fire, flood).
- **Irreparable *wear*** refers to deterioration sustained from day-to-day usage over time and a specific event cannot be identified.

Replacement of walkers ***prior to*** the 5-year reasonable useful lifetime (RUL) period being reached:

Replacement due to **irreparable *wear***:

- Medicare expects *rented* equipment to remain in good working order for the entire RUL of the equipment. Therefore, if the equipment does not last for the entire 5-year RUL, the supplier must replace the equipment at no charge.
- For member-owned equipment, coverage for replacement equipment is not allowed prior to the 5-year RUL for irreparable ***wear*** per Medicare statute.

Replacement due to **change in patient medical condition**:

- Replacement of rented or member-owned equipment may be warranted if:
- The current item(s) can no longer meet the patient's therapeutic medical needs; **and**
- It is the least costly option to replace the equipment in order to meet the patient's medical needs (rather than repair or reconfigure with available options).

Replacement of walkers ***after*** the 5-year RUL period is reached due to irreparable *wear* ***OR*** replacement ***at any time*** due to *theft, loss,* or irreparable *damage*:

- If the 5-year RUL of the equipment is reached, replacement must still be medically reasonable and necessary:
    - The member must be regularly using the equipment as prescribed; and,
    - The equipment continues to provide the needed therapeutic benefit.
        - For irreparably *worn* devices, documentation must support the current device no longer meets the therapeutic medical needs of the member and cannot be repaired to a state where it can provide the needed therapeutic benefit (e.g., it is not cost effective to repair the current device).

- If an item is still under manufacturer warranty and can be repaired, requests for replacement with a new device will be denied.

- For lost, stolen, or irreparably *damaged* devices, documentation of the specific incident of irreparable damage or a written explanation regarding the loss (e.g., details around circumstances of the loss, a police report for stolen items, etc.).

Replacement of Parts

Replacement of accessories or parts is allowed as medically necessary when needed for effective use of the walker. This includes, but may not be limited to, replacement of handgrips, tips, or brakes. See Billing Guidelines below for information regarding appropriate HCPCS coding for replacement parts.

SULLY WALKER – A POWERED WALKING AID

When CMS convened to create a new HCPCS code for this unique piece of equipment, they determined this device does **not** meet Medicare's criteria to be considered DME. In their Final Decision, CMS stated:

> "CMS recognizes this as a powered walker and suggests more evidence be presented that addresses certain safety concerns of the control trigger and ultimately the safety of the patient when the product is in motion."
>
> They also "welcome more evidence be presented that supports the manufacturer's medical claims of alleviating leg stress, hip pain, spinal misalignment along with arms, shoulder and neck discomfort."
>
> Finally, they "welcome evidence (such as case studies) demonstrating the medical benefit of the Sully Walker specifically when used in the home."

HCPCS code E0152 was added to the DMEMAC LCA A52503 as a non-covered item. Therefore, this device – and the code it is reported with – will be considered **not medically necessary** until such time Medicare determines it to be covered.

REGULATORY STATUS

U.S. FOOD & DRUG ADMINISTRATION (FDA)

While clearance by the Food and Drug Administration (FDA) is a prerequisite for Medicare coverage, the 510(k) premarket clearance process does not in itself establish medical necessity. Medicare payment policy is determined by the interaction of numerous requirements, including but not limited to, the availability of a Medicare benefit category and other statutory requirements, coding and pricing guidelines, as well as national and local coverage determinations and clinical evidence.

BILLING GUIDELINES AND CODING

GENERAL

See the associated local coverage article (LCA) for related billing and coding guidance:

- LCA: Walkers - Policy Article (A52503)

See the above LCA, as well as the LCA A55426 for documentation requirements.

REPLACEMENT PARTS

Codes A4636 (replacement handgrip), A4637 (replacement tip), and E0159 (replacement brake attachment) are only used to bill for replacement items for covered, *member-owned* walkers. These replacement items are not to be billed to the Company for *rented* walkers. This is because DME supplies are responsible for supplying any needed replacement equipment and parts on rented items.

Codes E0154 (platform attachment), E0156 (seat attachment), E0157 (crutch attachment), and E0158 (leg extension) can be used for accessories provided with the initial issue of a walker **or** for replacement components.

Code E0155 (wheel attachment) can be used for replacements on covered, member-owned wheeled walkers **or** when wheels are subsequently added to a covered, member-owned nonwheeled walker (E0130, E0135). Code E0155 cannot be used for wheels provided at the time of, or within one month of, the initial issue of a non-wheeled walker.

HCPCS CODE A9900

HCPCS code A9900 is not allowed separate payment by Medicare (Noridian website). For potentially covered items or accessories, other HCPCS codes would need to be used.

CODES*		
CPT	None	
HCPCS	A4636	Replacement, handgrip, cane, crutch, or walker, each
	A4637	Replacement, tip, cane, crutch, walker, each
	A9900	Miscellaneous DME supply, accessory, and/or service component of another HCPCS code
	E0130	Walker, rigid (pickup), adjustable or fixed height
	E0135	Walker, folding (pickup), adjustable or fixed height
	E0140	Walker, with trunk support, adjustable or fixed height, any type
	E0141	Walker, rigid, wheeled, adjustable or fixed height
	E0143	Walker, folding, wheeled, adjustable or fixed height
	E0144	Walker, enclosed, four sided framed, rigid or folding, wheeled with posterior seat
	E0147	Walker, heavy duty, multiple braking system, variable wheel resistance
	E0148	Walker, heavy duty, without wheels, rigid or folding, any type, each
	E0149	Walker, heavy duty, wheeled, rigid or folding, any type
	E0150	Combination wheeled walker with seat and transport chair, folding, adjustable or fixed height
	E0152	Walker, battery powered, wheeled, folding, adjustable or fixed height
	E0154	Platform attachment, walker, each

	E0155	Wheel attachment, rigid pick-up walker, per pair
	E0156	Seat attachment, walker
	E0157	Crutch attachment, walker, each
	E0158	Leg extensions for walker, per set of four (4)
	E0159	Brake attachment for wheeled walker, replacement, each
	E1399	Durable medical equipment, miscellaneous

***Coding Notes:**

- The code list above is provided as a courtesy and may not be all-inclusive. Inclusion or omission of a code from this policy neither implies nor guarantees reimbursement or coverage. Some codes may not require routine review for medical necessity, but they are subject to provider contracts, as well as member benefits, eligibility and potential utilization audit. According to Medicare, "presence of a payment amount in the MPFS and the Medicare physician fee schedule database (MPFSDB) does not imply that CMS has determined that the service may be covered by Medicare." The issuance of a CPT or HCPCS code or the provision of a payment or fee amount by Medicare does **not** make a procedure medically reasonable or necessary or a covered benefit by Medicare. *(Medicare Claims Processing Manual, Chapter 23 - Fee Schedule Administration and Coding Requirements, §30 - Services Paid Under the Medicare Physician's Fee Schedule, A. Physician's Services)*
- All unlisted codes are reviewed for medical necessity, correct coding, and pricing at the claim level. If an unlisted code is submitted for non-covered services addressed in this policy then it will be **denied as not covered**. If an unlisted code is submitted for potentially covered services addressed in this policy, to avoid post-service denial, **prior authorization is recommended**.
- **See the non-covered and prior authorization lists on the Company Medical Policy, Reimbursement Policy, Pharmacy Policy and Provider Information website for additional information.**
- HCPCS/CPT code(s) may be subject to National Correct Coding Initiative (NCCI) procedure-to-procedure (PTP) bundling edits and daily maximum edits known as "medically unlikely edits" (MUEs) published by the Centers for Medicare and Medicaid Services (CMS). This policy does not take precedence over NCCI edits or MUEs. Please refer to the CMS website for coding guidelines and applicable code combinations.

REFERENCES

1. Centers for Medicare & Medicaid Services' (CMS') Healthcare Common Procedure Coding System (HCPCS) Level II Final Coding, Benefit Category and Payment Determinations. Second Biannual (B2), 2023 HCPCS Coding Cycle. https://www.cms.gov/files/document/2023-hcpcs-application-summary-biannual-2-2023-non-drug-and-non-biological-items-and-services-posted.pdf. Accessed: 6/18/2024.

POLICY REVISION HISTORY

DATE	REVISION SUMMARY
4/2022	New Medicare Advantage medical policy (converted to new format 2/2023)
8/2023	Annual review; no changes
11/2023	Interim update; add replacement criteria
4/2024	Q2 2024 Code updates
8/2024	Annual review; add reference to LCA A52503 for powered walkers
8/2025	Annual review; no changes
10/2025	Q4 2025 Code updates