


<b>MEDICAL POLICY</b>	<b>Foot Care Guidelines (Medicare Only)</b>
<b>Effective Date: 1/1/2023</b>	Medical Policy Number: 369
 1/1/2023	Medical Policy Committee Approved Date: 11/2022
Medical Officer                      Date	

**See Policy CPT/HCPCS CODE section below for any prior authorization requirements**

**SCOPE:**

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

**APPLIES TO:**

Medicare Only

**DOCUMENTATION REQUIREMENTS:**

In order to determine the medical necessity of the request, the following documentation must be provided at the time of the request. Medical records to include documentation of all of the following:

- All medical records and chart notes demonstrating the patient’s physical status as being of such severity to meet the criteria for exceptions to the routine foot care exclusion.
  - Physical and/or clinical findings consistent with the diagnosis and indicative of severe peripheral involvement.
  - Documentation of conditions and procedures must be precise and specific (e.g., left great toe, right foot 4<sup>th</sup> digit, etc.).
  - Documentation which demonstrates the condition warrants a provider rendering these services and that failure to provide such professional services would be hazardous to the member due to their underlying medical condition(s).

**MEDICARE POLICY CRITERIA**

The following Centers for Medicare & Medicaid Service (CMS) guidelines should be utilized for medical necessity coverage determinations. Click the link provided in the table below to access applicable medical necessity criteria. All listed guidelines apply.

**Notes:** Member benefit language, which addresses excluded routine foot care services, may vary. Member benefit contract language takes precedent over medical policy.

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Service	Medicare Guidelines
<i>Foot Care</i>	<p>Applicable references related to foot care services include the following:</p> <ul style="list-style-type: none"> <li>• Medicare Benefit Policy Manual, Chapter 15 - Covered Medical and Other Health Services, <a href="#">§290 - Foot Care</a> (see the following subsections for the relevant topic): <ul style="list-style-type: none"> <li>○ B. Exclusions from Coverage, 2. Routine Foot Care</li> <li>○ C. Exceptions to Routine Foot Care Exclusion</li> <li>○ D. Systemic Conditions That Might Justify Coverage</li> <li>○ F. Presumption of Coverage</li> <li>○ G. Application of Foot Care Exclusions to Physician’s Services</li> </ul> </li> <li>• Local Coverage Determination (LCD): Wound and Ulcer Care (<a href="#">L38904</a>)</li> <li>• Local Coverage Article (LCA): Billing and Coding: Routine Foot Care (<a href="#">A57957</a>)</li> </ul>

**POLICY GUIDELINES**

Medicare and Foot Care Services

According to the Medicare Benefit Policy Manual:

“... Services that normally are considered routine and not covered by Medicare include the following:

- The cutting or removal of corns and calluses;
- The trimming, cutting, clipping, or debriding of nails; and
- Other hygienic and preventive maintenance care, such as cleaning and soaking the feet, the use of skin creams to maintain skin tone of either ambulatory or bedfast patients, and any other service performed in the absence of localized illness, injury, or symptoms involving the foot.”

However, there are exceptions to the routine foot care exclusion, which include the following:

1. **Foot care services rendered as a necessary and integral part of otherwise covered services.**
2. **Treatment of warts on the foot.**
3. **Foot care services rendered to individuals with a systemic condition.** This is when foot care services may pose a hazard when performed by a nonprofessional person on patients with such systemic conditions.
4. **Treatment of mycotic nails:** Aside from individuals with a systemic condition noted above, the treatment of mycotic nails may also be eligible for coverage in the *absence* of a systemic condition in one of the following circumstances:

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- The treatment of mycotic nails for an **ambulatory** patient is covered only when the physician attending the patient's mycotic condition documents that:
  - there is clinical evidence of mycosis of the toenail, and
  - the patient has marked limitation of ambulation, pain, or secondary infection resulting from the thickening and dystrophy of the infected toenail plate.
- The treatment of mycotic nails for a **nonambulatory** patient is covered only when the physician attending the patient's mycotic condition documents that:
  - there is clinical evidence of mycosis of the toenail, and
  - the patient suffers from pain or secondary infection resulting from the thickening and dystrophy of the infected toenail plate.

### *Systemic Conditions*

Medicare lists systemic conditions which may justify the medical necessity and coverage for routine foot care. The following metabolic, neurologic, and peripheral vascular diseases represent some of the most common underlying conditions that might justify coverage for routine foot care (**NOTE:** This is not intended to be a comprehensive list)<sup>1</sup>:

- Diabetes mellitus \*
- Arteriosclerosis obliterans (A.S.O., arteriosclerosis of the extremities, occlusive peripheral arteriosclerosis)
- Buerger's disease (thromboangiitis obliterans)
- Chronic thrombophlebitis \*
- Peripheral neuropathies involving the feet -
  - Associated with malnutrition and vitamin deficiency \*
    - Malnutrition (general, pellagra)
    - Alcoholism
    - Malabsorption (celiac disease, tropical sprue)
    - Pernicious anemia
  - Associated with carcinoma \*
  - Associated with diabetes mellitus \*
  - Associated with drugs and toxins \*
  - Associated with multiple sclerosis \*
  - Associated with uremia (chronic renal disease) \*
  - Associated with traumatic injury
  - Associated with leprosy or neurosyphilis
  - Associated with hereditary disorders
    - Hereditary sensory radicular neuropathy
    - Angiokeratoma corporis diffusum (Fabry's)
    - Amyloid neuropathy

For conditions designated by an asterisk (\*), routine procedures are covered only if the patient is under the active care of a doctor of medicine or osteopathy (MD or DO) who documents the condition.

*Foot Care for Diabetic Sensory Neuropathy: Loss of Protective Sensation (LOPS)*

Medicare allows an evaluation (examination and treatment) of the feet no more frequently than every six (6) months for individuals with a documented diagnosis of diabetic sensory neuropathy and LOPS, but only when the patient has **not** seen a foot care specialist for another reason during that 6-month period. The diagnosis of diabetic sensory neuropathy with LOPS should already be established and documented prior to coverage of foot care. Other causes of peripheral neuropathy should be considered and ruled out by the primary care physician prior to initiating or referring for foot care for persons with LOPS.<sup>2,3</sup>

*Presumption of Coverage*

In evaluating whether the coverage requirements routine foot services are met, a presumption of coverage may be made where the clinical documentation and medical record discloses certain physical and/or clinical findings consistent with the diagnosis and indicative of severe peripheral involvement. For purposes of applying this presumption, the following findings are pertinent:

**Class A Findings**

- Nontraumatic amputation of foot or integral skeletal portion thereof.

**Class B Findings**

- Absent posterior tibial pulse;
- Advanced trophic changes as: hair growth (decrease or absence) nail changes (thickening) pigmentary changes (discoloration) skin texture (thin, shiny) skin color (rubor or redness) (Three required); and
- Absent dorsalis pedis pulse.

**Class C Findings**

- Claudication;
- Temperature changes (e.g., cold feet);
- Edema;
- Paresthesias (abnormal spontaneous sensations in the feet); and
- Burning.

The presumption of coverage applies when the provider rendering the routine foot care has identified and documented:

- A. A Class A finding;
- B. Two of the Class B findings; or
- C. One Class B and two Class C findings.

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### *Complaints of Pain*

According to Noridian:

“... foot care services associated with a patient's complaints of pain would not be considered routine in nature. Pain may indicate a problem, such as an ulcer or infection, which is necessary to evaluate. If pain is associated with the reason for the foot care, it is reasonable and necessary for the medical professional to assess and evaluate the pain, and subsequently treat both the pain and the cause of the pain if possible.”<sup>4</sup>

### *Application of the Foot Care Exclusion to Physician’s Services*

The exclusion of foot care is determined by the nature of the service, regardless of the type of clinician who provides the service. Coverage is not determined by the difficulty or complexity of the procedure.

Medicare expects relatively few claims for routine-type foot care to be anticipated considering the severity of conditions contemplated as the basis for this exception. Medicare states, “[c]laims for this type of foot care should not be allowed in the absence of convincing evidence that nonprofessional performance of the service would have been hazardous for the beneficiary because of an underlying systemic disease.”

## **BILLING GUIDELINES**

### General

CPT codes 11055, 11056 and 11057 describe treatment of hyperkeratotic lesions (e.g., corns and calluses).

Coverage of claims for CPT codes 11055, 11056, 11057, 11719, 11720, 11721, and G0127 is made in accordance with the billing guidance and diagnosis code lists provided by Noridian in the LCA [A57957](#), with additional considerations provided by LCA [A58567](#) (*LCA: Billing and Coding: Wound and Ulcer Care*) for CPT codes 11055-11057.

### HCPCS Code S0390

Like all S-codes, the *National Physician Fee Schedule Relative Value File (NPF SRVF)*, which is published by the Centers for Medicare and Medicaid Services (CMS)<sup>5</sup>, indicates HCPCS code S0390 has been assigned a Status Indicator of “I.” This is defined as “Not valid for Medicare purposes.” In addition, HCPCS code S0390 is not recognized as a valid code for claim submission as indicated in the relevant Company Coding Policy (*HCPCS S-Codes and H-Codes*, 22.0). Providers need to use alternate available CPT or HCPCS codes to report for the service. If no specific CPT or HCPCS code is available, then an unlisted code may be used. Note that unlisted codes are reviewed for medical necessity, correct coding, and pricing at the claim level. Thus, if an unlisted code is billed related to a non-covered service addressed in this policy, it will be denied as not covered.

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## CPT/HCPCS CODES

<b>Medicare Only</b>	
<b>No Prior Authorization Required</b>	
Note: Inclusion of a code in this section does not guarantee reimbursement or coverage. The following codes do not require routine review for medical necessity, but they may be subject to audit or benefit denial.	
<b>Treatment of Hyperkeratotic Lesions (e.g., corns and calluses)</b>	
11055	Paring or cutting of benign hyperkeratotic lesion (eg, corn or callus); single lesion
11056	Paring or cutting of benign hyperkeratotic lesion (eg, corn or callus); 2 to 4 lesions
11057	Paring or cutting of benign hyperkeratotic lesion (eg, corn or callus); more than 4 lesions
<b>Use if needed to create sections within the code table. Delete if not used.</b>	
11719	Trimming of nondystrophic nails, any number
11720	Debridement of nail(s) by any method(s); 1 to 5
11721	Debridement of nail(s) by any method(s); 6 or more
G0127	Trimming of dystrophic nails, any number
<b>Not Covered</b>	
S0390	Routine foot care; removal and/or trimming of corns, calluses and/or nails and preventive maintenance in specific medical conditions (e.g., diabetes), per visit ( <i>CMS-assigned Status "I" code – See "Billing Guidelines"</i> )

## INSTRUCTIONS FOR USE

Company Medical Policies serve as guidance for the administration of plan benefits. Medical policies do not constitute medical advice nor a guarantee of coverage. Company Medical Policies are reviewed annually and are based upon published, peer-reviewed scientific evidence and evidence-based clinical practice guidelines that are available as of the last policy update. The Companies reserve the right to determine the application of Medical Policies and make revisions to Medical Policies at any time. Providers will be given at least 60-days notice of policy changes that are restrictive in nature.

The scope and availability of all plan benefits are determined in accordance with the applicable coverage agreement. Any conflict or variance between the terms of the coverage agreement and Company Medical Policy will be resolved in favor of the coverage agreement.

## REGULATORY STATUS

### Mental Health Parity Statement

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.

## REFERENCES

1. Medicare Benefit Policy Manual, Chapter 15 - Covered Medical and Other Health Services, §290 - Foot Care; Available at: <https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/bp102c15.pdf>
2. National Coverage Determination (NCD) for Services Provided for the Diagnosis and Treatment of Diabetic Sensory Neuropathy with Loss of Protective Sensation (aka Diabetic Peripheral Neuropathy) (70.2.1); Available at: <https://www.cms.gov/medicare-coverage-database/view/ncd.aspx?ncdid=171>
3. Noridian web page for *Foot Care for Patients with Chronic Disease*; Last Updated: 2/8/2021; Available at: <https://med.noridianmedicare.com/web/jfb/specialties/podiatry/foot-care-for-patients-with-chronic-disease>
4. Noridian LCA: Coverage of Foot Care Services (A52918); Available at: <https://www.cms.gov/medicare-coverage-database/view/article.aspx?articleid=52918>
5. Medicare Physician Fee Schedule (PFS) Relative Value Files; Available at: <https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/PhysicianFeeSched/PFS-Relative-Value-Files>