

2025 CAC/PIAC Meeting Update

LA County Podiatric Medical Association
Present Treasure Hunt Conference

David A. Pougatsch, DPM
Thomas E. Rambacher, DPM

*9301 Wilshire Blvd., Suite 420
Beverly Hills, CA 90210
info@solutionpm.com
(310) 869-8857 [DP] (949) 637-0038 [TR]*

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- Neither Thomas E. Rambacher DPM nor David A. Pougatsch, DPM have any relevant financial interests to disclose.
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- Commercial support was not received for this activity.

Learning Objectives

- Identify new programs CMS is planning
- Analyze the MACs expectations regarding documentation
- Gain knowledge of using LCD language to protect our documentation
- Understand the different audits and appeals
- Introduce new services that can ethically enhance office income
- Understand the 2026 changes in rules, regulations, and coding

Overview

- 2025 CAC PIAC Meeting November 14, 2025
- Advocacy priorities
- Medicare policy changes
- Skin substitutes
- BMAD trends
- Medicare Advantage

APMA Advocacy

- Reducing burdens
 - Prior authorizations
 - Therapeutic shoes
- Permanent reimbursement fix
- Branding initiatives
- Education & research

Legislative Victories

- Payment reform
 - 2.5% Medicare update
- Misclassification opposed
- DEA MATE Act resolved
- SALT preserved

MPFS 2026

- Two conversion factors
 - QP \$33.5675
 - Non-QP \$33.4009
- Efficiency -2.5%
- RVU increases

Skin Substitutes Payment

- \$127.28/cm²
- Incident-to billing
 - FDA categories
 - BLA ASP+6%
- Annual review

Skin Substitutes LCD

- Effective Jan 1 2026
 - 20 DFU products
 - 5 VLU products
- 200+ non-covered

- **NOW PAUSED**

MIPS and MVP

- 75-point threshold
- New Podiatry MVP
- Registration required

WISeR Model

- Wasteful and Inappropriate Service Reduction
- 2026–2031
- Six states (AZ, NJ, OH, OK, TX, WA)
- Prior auth/pre-payment
- Skin substitute focus

Compliance and Audits

- High-risk audits
- Vendor scrutiny
 - Unfamiliar referrals
 - Improper compensation
 - Billing misuse
 - Altered records

Medicare Advantage

- 50% enrolled
- 17 exits 2026
- 1M impacted
- Enrollment decline

Medicare Advantage – Prior Authorizations

- 7-day standard
- 72-hour expedited
- Specific denials
- Transparency

Coverage Limits

- Follow NCD/LCD
- Cannot exclude podiatrists
- Evidence-based

Gold Carding and Downcoding

- Gold card programs
 - State only
- Downcoding rising
- Appeal

BMAD Trends

- E&M 50%
- Low podiatry E&M
- Part B \$3B
- Audit focus
- Amputation concerns
- Shoe decline
- DME risks
- \$22.7M improper

CAC/PIAC Training

- Medical director engagement
- Relationship building
- Monitor MAC
- Newsletters
- Communicate denials

CPMA State Representatives for CAC/PIAC

- Gabe Halperin, DPM
- David Pougatsch, DPM
- Thomas Rambacher, DPM

Part 2: ICD-10/CPT Update