

Legislative Report

STUDY OF PAYMENT RATES FOR DURABLE MEDICAL EQUIPMENT AND SUPPLIES

Purchasing and Service Delivery

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I. Executive summary

Through passage of section 503 of the Consolidated Appropriations Act and section 5002 of the 21st Century Cures Act of 2016, Congress added section 1903(i)(27) to the Social Security Act. These changes prohibit federal Medicaid reimbursement to states for certain durable medical equipment (DME) expenditures that are, in the aggregate, in excess of what Medicare would have paid for such items. The requirement went into effect January 1, 2018.¹

An upper payment limit (UPL) calculation will be used to determine whether DME expenditures for applicable items in Minnesota are, in the aggregate, above the Medicare rate. The UPL is a federal limit on fee-for-service Medicaid reimbursement, which limits federal financial participation (FFP) for state expenditures for certain durable medical equipment. A UPL demonstration must be completed on an annual basis and submitted to the Centers for Medicare and Medicaid Services (CMS) if a state's payment methodology is higher than the Medicare rate.² If a state's fee schedule approved under its state plan for the DME subject to the FFP limitation are at or below Medicare's rate, that state can attest to that and is not required to complete and submit a UPL demonstration. If a state's rate exceeds the Medicare rate, that state must complete and submit the demonstration and must return the overpayment to CMS.

This report will explain why a study on the impact of access by basing medical assistance payment for durable medical equipment and medical supplies on Medicare payment rates, cannot be completed at this time. The first half of 2020 would be the earliest a complete report of payment rates for DME can be run in order to assess any impacts on access. Current payment methodology required under Minnesota Statute 256B.766, bases most DME payments on Medicare plus an additional add-on. With this methodology, it is likely the UPL calculation will show an aggregate payment higher than Medicare.

¹ Limit on Federal Financial Participation for Durable Medical Equipment in Medicaid, corrected January 4, 2018: https://www.medicaid.gov/federal-policy-guidance/downloads/smd18001.pdf.

² Payment Limit Demonstrations, Centers for Medicare and Medicaid Services: <u>https://www.medicaid.gov/medicaid/finance/payment-limit-demonstrations/index.html</u>. Study Of Payment Rates For Durable Medical Equipment And Supplies

II. Legislation

Minnesota 2017, 1st Special Session, Chapter 6, Article 4, Section 64

STUDY OF PAYMENT RATES FOR DURABLE MEDICAL EQUIPMENT AND SUPPLIES.

The commissioner of human services shall study the impact of basing medical assistance payment for durable medical equipment and medical supplies on Medicare payment rates, as limited by the payment provisions in the 21st Century Cures Act, Public Law 114-255, on access by medical assistance enrollees to these items. The study must include recommendations for ensuring and improving access by medical assistance enrollees to durable medical equipment and medical supplies. The commissioner shall report study results and recommendations to the chairs and ranking minority members of the legislative committees with jurisdiction over health and human services policy and finance by January 1, 2019.

III. Background

The 2017 Legislature requested a study on the impact of basing medical assistance payment for durable medical equipment and medical supplies on Medicare payment rates, as limited by the payment provisions in the 21st Century Cures Act, Public Law 114-255. Effective January 1, 2018, the law prohibits federal funds for certain durable medical equipment that are, in the aggregate, in excess of what Medicare would have paid for the same items within the fee-for-service program. Providers have expressed concerns that this reduction in payment could affect patient access.

The upper payment limit requirement applies to certain fee-for-service DME items, not all items. The categories of DME items include those listed below. (Appendix- List of HCPCS Codes Subject to the Upper Payment Limit).

- nebulizers
- crutches
- canes
- commodes
- decubitus care equipment
- heat/cold application device
- hospital beds and accessories
- oxygen and related respiratory equipment
- intermittent positive pressure breathing (IPPB) machines
- monitoring devices

- compression devices
- ultraviolet light devices
- infusion pumps
- traction devices
- orthopedic devices
- manual and power wheelchairs
- wheelchair accessories
- power operated vehicles
- flexion/extension devices
- wound therapy
- speech generating devices

Only items that are covered by Medicare, and have an established Medicare rate, are subject to the upper payment limit. Orthotics, prosthetics, medical supplies, and items for which Medicare is not the primary payer are not subject to the UPL. Additionally, items that are subject to volume purchasing strategies are exempt from the UPL. In Minnesota, that includes oxygen. Finally, DME items provided in an institutional setting paid as a part of the institutional payment are not subject to the UPL.

Medicare establishes different payment rates for DME depending on the location of the enrollee. In Medicare this includes a rural rate, a non-rural rate, and a competitive bid area rate. Minnesota's Medicare Competitive Bidding Area (CBA) includes the counties of Hennepin, Ramsey, Dakota, Washington, Anoka, Carver, Scott, Chisago, Isanti, Sherburne, and Wright and is referred to as the Minneapolis-St. Paul-Bloomington CBA. The areas included in the CBA are further defined by ZIP code.³ States may elect to perform the UPL calculation using the applicable Medicare rate for the area of the state, or the lowest Medicare rate that would have been paid.

³ DMEPOS Competitive Bidding Program, revised June 26, 2018: https://www.dmecompetitivebid.com/palmetto/cbicrd2recompete.nsf/vMasterDID/9L2SSW0884

IV. Calculation of the Upper Payment Limit

CMS has indicated that all states must demonstrate compliance with the UPL unless they either use Medicare payment rates (or a lesser percentage thereof) to reimburse providers for DME or conduct a robust comparison using rate and utilization data to show that their aggregate reimbursement is less than the aggregate reimbursement using the Medicare rates. Minnesota's current rate methods for DME prohibit the state from meeting either exception, so the state must conduct the annual demonstration of compliance with the UPL.

Under current law, (256B.766) with a few exceptions for more specialized items, Minnesota's payment rates under the Medicaid program for durable medical equipment and supplies are based on the Medicare rate plus an additional add-on payment. Currently, there are two add-ons for DME products that were subject to a previous competitive bid performed by Medicare in 2008. Additionally, a provision in Minnesota law prohibits the Medicaid program from following the Medicare rate if the Medicare rate is reduced as a result of a competitive bid.

Current law assumes that the state Medicaid program collects federal financial participation on the state share of payments made to providers, except where the state legislature specifically requires the use of state funds without a federal match. The Cures Act limits the amount of federal financial participation that states can receive for DME products to the amount that they would receive, in the aggregate, had the Medicare rate been paid.

As mentioned above, the majority of DME products are paid in excess of the Medicare rate, thus it is reasonable to assume that the upper payment limit calculation will show that the aggregate federal financial participation collected by Minnesota will be in excess of the amount allowed. The Centers for Medicare and Medicaid Services have informed states that any federal financial participation received in excess of the aggregate limit will need to be refunded. Likewise, the state share of any amount that exceeds the limit will be returned to the state general fund.

Guidance released by CMS over the past several months have clarified that states are to submit the results of their upper payment limit calculations by March of the following year. With the upper payment limit taking effect January 1, 2018, the first calculation that will be performed will be done in March of 2019 for calendar year 2018, with an upper payment calculation occurring each March thereafter for the previous calendar year. Given this timeline from CMS, an upper payment limit calculation has not yet occurred, and as a result, no recoupments from providers have occurred either.

V. Access

The aim of this report is to assess if limiting payments to DME providers to the Medicare rate will have an impact on access for Medicaid fee-for-service recipients. As mentioned in the previous section of the report, the limitation on federal financial participation took effect in January of 2018, with the first upper payment limit calculation required by CMS in March of 2019 for calendar year 2018.

Given the effective date, the upper payment limit calculation has not been performed. DHS will use the list of codes provided by CMS to pull the appropriate data in early 2019 and complete the analysis of comparing Minnesota Medicaid payments in the aggregate on those DME products to the aggregate payment amount had Medicare rates been paid. Once that analysis is complete, submitted and validated by CMS, the department will then reprocess claims in accordance with the upper payment limit calculation.

Because the UPL is based on an aggregate limit, DHS cannot provide an accurate analysis until all services have been rendered for 2018. When DHS performs the analysis to meet the March 2019 due date from CMS, time for claims run out for services rendered in 2018 will have occurred, and the department will be able to determine how much the state's Medicaid program payments exceed the federal limit.

However, even with that initial information, the department is not able to perform the needed analysis to assess if this change has had an impact on access. Once the upper payment limit calculation is performed in March of 2019, it will take some time to submit to CMS, receive confirmation from CMS, and have the claims reprocessed in order to collect the portion of any payment over the aggregate limit. This process is likely to be completed sometime in the middle of 2019 and thus the payment change will not be realized by providers until that time. With those factors in mind, it is unlikely that any changes in provider behavior that could impact access as result of the upper payment limit could potentially be analyzed before the first half of 2020.

As mentioned earlier in the report, the upper payment limit was largely based on competitive bids that were done by Medicare on DME products. In 2016, CMS released a fact sheet claiming Medicare's Competitive Bid Program has maintained Medicare beneficiary access to quality products from accredited suppliers in all competitive bidding areas, with few beneficiary complaints. CMS implemented real-time claims monitoring, customer satisfaction surveys, and a formal complaint process for beneficiaries, caregivers, providers and suppliers for reporting concerns about contract suppliers or other competitive bidding implementation issues.⁴

While an impact cannot be measured in Minnesota at this time, Michigan has worked with CMS to determine whether changes to their rates would be necessary as a result of the 21st Century Cures Act.

⁴ Competitive bidding program continues to maintain access and quality while helping to save Medicare millions, Centers for Medicare and Medicaid Services, September 8, 2016: https://www.cms.gov/newsroom/fact-sheets/competitive-bidding-program-continues-maintain-access-and-quality-while-helping-save-medicare.

After Michigan conducted the robust comparison necessary to demonstrate their current rates and payments are below the aggregate annual UPL, CMS confirmed that the state was below Medicare's aggregate limit, and they will not need to conduct an annual demonstration of compliance with the UPL. In conversation with Michigan, the state shared their observations on the impact of the implementation of the Competitive Bid Program in their area. Michigan has been running reports for the past four years and each year the number of smaller DME providers has decreased and the number of large, typically out-of-state providers that are enrolled as Medicare providers with competitive bid contracts, has steadily increased. The state shared the number of services provided to Medicaid recipients over the past four years has not decreased.

DHS will conduct the annual analysis and reprocess payments from providers as appropriate to maintain compliance with this federal requirement. The department will also monitor access as the changes make their way through the system to assess what, if any impact, these changes have on the state's Medicaid program.

VI. Appendix- List of HCPCS Codes Subject to the Upper Payment Limit*

*The following codes represent codes that Medicare paid in 2017. New codes in 2018 or subsequent years that are paid by Medicare will become part of that year's UPL calculation as well.

Procedure Code	Procedure Code Description	Procedure Code Type
A7007	Lg vol nebulizer disposable	DME Equipment
A7009	Nebulizer reservoir bottle	DME Equipment
A7017	Nebulizer not used w oxygen	DME Equipment
E0100	Cane adjust/fixed with tip	DME Equipment
E0105	Cane adjust/fixed quad/3 pro	DME Equipment
E0110	Crutch forearm pair	DME Equipment
E0111	Crutch forearm each	DME Equipment
E0112	Crutch underarm pair wood	DME Equipment
E0113	Crutch underarm each wood	DME Equipment
E0114	Crutch underarm pair no wood	DME Equipment
E0116	Crutch underarm each no wood	DME Equipment
E0118	Crutch substitute	DME Equipment
E0130	Walker rigid adjust/fixed ht	DME Equipment
E0135	Walker folding adjust/fixed	DME Equipment
E0140	Walker w trunk support	DME Equipment
E0141	Rigid wheeled walker adj/fix	DME Equipment
E0143	Walker folding wheeled w/o s	DME Equipment
E0144	Enclosed walker w rear seat	DME Equipment
E0147	Walker variable wheel resist	DME Equipment
E0148	Heavy duty walker no wheels	DME Equipment

Procedure Code	Procedure Code Description	Procedure Code Type
E0160	Sitz type bath or equipment	DME Equipment
E0161	Sitz bath/equipment w/faucet	DME Equipment
E0163	Commode chair with fixed arm	DME Equipment
E0165	Commode chair with detacharm	DME Equipment
E0167	Commode chair pail or pan	DME Equipment
E0168	Heavyduty/wide commode chair	DME Equipment
E0170	Commode chair electric	DME Equipment
E0171	Commode chair non-electric	DME Equipment
E0181	Press pad alternating w/ pum	DME Equipment
E0184	Dry pressure mattress	DME Equipment
E0185	Gel pressure mattress pad	DME Equipment
E0186	Air pressure mattress	DME Equipment
E0188	Synthetic sheepskin pad	DME Equipment
E0189	Lambswool sheepskin pad	DME Equipment
E0193	Powered air flotation bed	DME Equipment
E0194	Air fluidized bed	DME Equipment
E0196	Gel pressure mattress	DME Equipment
E0197	Air pressure pad for mattres	DME Equipment
E0199	Dry pressure pad for mattres	DME Equipment
E0210	Electric heat pad standard	DME Equipment
E0235	Paraffin bath unit portable	DME Equipment
E0250	Hosp bed fixed ht w/ mattres	DME Equipment
E0251	Hosp bed fixd ht w/o mattres	DME Equipment
E0255	Hospital bed var ht w/ mattr	DME Equipment
E0256	Hospital bed var ht w/o matt	DME Equipment

Procedure Code	Procedure Code Description	Procedure Code Type
E0261	Hosp bed semi-electr w/o mat	DME Equipment
E0265	Hosp bed total electr w/ mat	DME Equipment
E0266	Hosp bed total elec w/o matt	DME Equipment
E0277	Powered pres-redu air mattrs	DME Equipment
E0290	Hosp bed fx ht w/o rails w/m	DME Equipment
E0291	Hosp bed fx ht w/o rail w/o	DME Equipment
E0292	Hosp bed var ht no sr w/matt	DME Equipment
E0293	Hosp bed var ht no sr no mat	DME Equipment
E0294	Hosp bed semi-elect w/ mattr	DME Equipment
E0295	Hosp bed semi-elect w/o matt	DME Equipment
E0296	Hosp bed total elect w/ matt	DME Equipment
E0300	Enclosed ped crib hosp grade	DME Equipment
E0301	HD hosp bed, 350-600 lbs	DME Equipment
E0302	Ex hd hosp bed > 600 lbs	DME Equipment
E0303	Hosp bed hvy dty xtra wide	DME Equipment
E0304	Hosp bed xtra hvy dty x wide	DME Equipment
E0329	Ped hospital bed semi/elect	DME Equipment
E0371	Nonpower mattress overlay	DME Equipment
E0372	Powered air mattress overlay	DME Equipment
E0373	Nonpowered pressure mattress	DME Equipment
E0424	Stationary compressed gas 02	DME Equipment
E0431	Portable gaseous 02	DME Equipment
E0434	Portable liquid 02	DME Equipment
E0439	Stationary liquid 02	DME Equipment
E0441	Oxygen contents, gaseous	DME Equipment

Procedure Code	Procedure Code Description	Procedure Code Type
E0442	Oxygen contents, liquid	DME Equipment
E0444	Portable 02 contents, liquid	DME Equipment
E0465	Home vent invasive interface	DME Equipment
E0466	Home vent non-invasive inter	DME Equipment
E0470	RAD w/o backup non-inv intfc	DME Equipment
E0471	RAD w/backup non inv intrfc	DME Equipment
E0472	RAD w backup invasive intrfc	DME Equipment
E0482	Cough stimulating device	DME Equipment
E0483	Chest compression gen system	DME Equipment
E0500	Ippb all types	DME Equipment
E0570	Nebulizer with compression	DME Equipment
E0572	Aerosol compressor adjust pr	DME Equipment
E0574	Ultrasonic generator w svneb	DME Equipment
E0585	Nebulizer w/ compressor & he	DME Equipment
E0600	Suction pump portab hom modl	DME Equipment
E0601	Cont airway pressure device	DME Equipment
E0607	Blood glucose monitor home	DME Equipment
E0620	Cap bld skin piercing laser	DME Equipment
E0627	Seat lift incorp lift-chair	DME Equipment
E0629	Seat lift for pt furn-non-el	DME Equipment
E0630	Patient lift hydraulic	DME Equipment
E0635	Patient lift electric	DME Equipment
E0636	PT support & positioning sys	DME Equipment
E0639	Moveable patient lift system	DME Equipment
E0640	Fixed patient lift system	DME Equipment

Procedure Code	Procedure Code Description	Procedure Code Type
E0651	Pneum compressor segmental	DME Equipment
E0652	Pneum compres w/cal pressure	DME Equipment
E0691	Uvl pnl 2 sq ft or less	DME Equipment
E0692	Uvl sys panel 4 ft	DME Equipment
E0693	Uvl sys panel 6 ft	DME Equipment
E0694	Uvl md cabinet sys 6 ft	DME Equipment
E0720	Tens two lead	DME Equipment
E0730	Tens four lead	DME Equipment
E0740	Incontinence treatment systm	DME Equipment
E0745	Neuromuscular stim for shock	DME Equipment
E0747	Elec osteogen stim not spine	DME Equipment
E0748	Elec osteogen stim spinal	DME Equipment
E0760	Osteogen ultrasound stimltor	DME Equipment
E0764	Functional neuromuscularstim	DME Equipment
E0779	Amb infusion pump mechanical	DME Equipment
E0781	External ambulatory infus pu	DME Equipment
E0784	Ext amb infusn pump insulin	DME Equipment
E0791	Parenteral infusion pump sta	DME Equipment
E0849	Cervical pneum trac equip	DME Equipment
E0855	Cervical traction equipment	DME Equipment
E0860	Tract equip cervical tract	DME Equipment
E0870	Tract frame attach footboard	DME Equipment
E0880	Trac stand free stand extrem	DME Equipment
E0900	Trac stand free stand pelvic	DME Equipment
E0910	Trapeze bar attached to bed	DME Equipment

Procedure Code	Procedure Code Description	Procedure Code Type
E0911	HD trapeze bar attach to bed	DME Equipment
E0912	HD trapeze bar free standing	DME Equipment
E0920	Fracture frame attached to b	DME Equipment
E0930	Fracture frame free standing	DME Equipment
E0935	Cont pas motion exercise dev	DME Equipment
E0940	Trapeze bar free standing	DME Equipment
E0941	Gravity assisted traction de	DME Equipment
E0946	Fracture frame dual w cross	DME Equipment
E0947	Fracture frame attachmnts pe	DME Equipment
E1031	Rollabout chair with casters	DME Equipment
E1035	Patient transfer system	DME Equipment
E1036	Patient transfer system	DME Equipment
E1037	Transport chair, ped size	DME Equipment
E1038	Transport chair pt wt<=300lb	DME Equipment
E1039	Transport chair pt wt >300lb	DME Equipment
E1086	Hemi-wheelchair detachable a	DME Equipment
E1088	Wheelchair lightweight det a	DME Equipment
E1093	Wheelchair wide w/ foot rest	DME Equipment
E1130	Whichr stand fxd arm ft rest	DME Equipment
E1140	Wheelchair standard detach a	DME Equipment
E1150	Wheelchair standard w/ leg r	DME Equipment
E1160	Wheelchair fixed arms	DME Equipment
E1161	Manual adult wc w tiltinspac	DME Equipment
E1232	Folding ped wc tilt-in-space	DME Equipment
E1233	Rig ped wc tltnspc w/o seat	DME Equipment

Procedure Code	Procedure Code Description	Procedure Code Type
E1234	Fld ped wc tltnspc w/o seat	DME Equipment
E1235	Rigid ped wc adjustable	DME Equipment
E1236	Folding ped wc adjustable	DME Equipment
E1237	Rgd ped wc adjstabl w/o seat	DME Equipment
E1238	Fld ped wc adjstabl w/o seat	DME Equipment
E1240	Whchr litwt det arm leg rest	DME Equipment
E1250	Wheelchair lightwt fixed arm	DME Equipment
E1260	Wheelchair lightwt foot rest	DME Equipment
E1390	Oxygen concentrator	DME Equipment
E1391	Oxygen concentrator, dual	DME Equipment
E1392	Portable oxygen concentrator	DME Equipment
E1800	Adjust elbow ext/flex device	DME Equipment
E1801	SPS elbow device	DME Equipment
E1802	Adjst forearm pro/sup device	DME Equipment
E1805	Adjust wrist ext/flex device	DME Equipment
E1806	SPS wrist device	DME Equipment
E1810	Adjust knee ext/flex device	DME Equipment
E1811	SPS knee device	DME Equipment
E1812	Knee ext/flex w act res ctrl	DME Equipment
E1815	Adjust ankle ext/flex device	DME Equipment
E1816	SPS ankle device	DME Equipment
E1818	SPS forearm device	DME Equipment
E1820	Soft interface material	DME Equipment
E1821	Replacement interface SPSD	DME Equipment
E1825	Adjust finger ext/flex devc	DME Equipment

Procedure Code	Procedure Code Description	Procedure Code Type
E1830	Adjust toe ext/flex device	DME Equipment
E1831	Static str toe dev ext/flex	DME Equipment
E1840	Adj shoulder ext/flex device	DME Equipment
E1841	Static str shldr dev rom adj	DME Equipment
E2000	Gastric suction pump hme mdl	DME Equipment
E2100	Bld glucose monitor w voice	DME Equipment
E2101	Bld glucose monitor w lance	DME Equipment
E2402	Neg press wound therapy pump	DME Equipment
E2500	SGD digitized pre-rec <=8min	DME Equipment
E2502	SGD prerec msg >8min <=20min	DME Equipment
E2508	SGD spelling phys contact	DME Equipment
E2510	SGD w multi methods msg/accs	DME Equipment
K0001	Standard wheelchair	DME Equipment
К0002	Stnd hemi (low seat) whichr	DME Equipment
К0003	Lightweight wheelchair	DME Equipment
K0004	High strength Itwt whichr	DME Equipment
К0005	Ultralightweight wheelchair	DME Equipment
кооо6	Heavy duty wheelchair	DME Equipment
К0007	Extra heavy duty wheelchair	DME Equipment
кооо9	Other manual wheelchair/base	DME Equipment
K0010	Stnd wt frame power whichr	DME Equipment
K0011	Stnd wt pwr whichr w control	DME Equipment
K0012	Ltwt portbl power whichr	DME Equipment
K0455	Pump uninterrupted infusion	DME Equipment
K0554	Ther cgm receiver/monitor	DME Equipment

Procedure Code	Procedure Code Description	Procedure Code Type
K0730	Ctrl dose inh drug deliv sys	DME Equipment
К0738	Portable gas oxygen system	DME Equipment
К0800	POV group 1 std up to 300lbs	DME Equipment
K0801	POV group 1 hd 301-450 lbs	DME Equipment
К0802	POV group 1 vhd 451-600 lbs	DME Equipment
К0806	POV group 2 std up to 300lbs	DME Equipment
К0807	POV group 2 hd 301-450 lbs	DME Equipment
К0808	POV group 2 vhd 451-600 lbs	DME Equipment
K0813	PWC gp 1 std port seat/back	DME Equipment
K0814	PWC gp 1 std port cap chair	DME Equipment
K0815	PWC gp 1 std seat/back	DME Equipment
K0816	PWC gp 1 std cap chair	DME Equipment
K0820	PWC gp 2 std port seat/back	DME Equipment
K0821	PWC gp 2 std port cap chair	DME Equipment
K0822	PWC gp 2 std seat/back	DME Equipment
K0823	PWC gp 2 std cap chair	DME Equipment
K0824	PWC gp 2 hd seat/back	DME Equipment
K0825	PWC gp 2 hd cap chair	DME Equipment
K0826	PWC gp 2 vhd seat/back	DME Equipment
K0827	PWC gp vhd cap chair	DME Equipment
K0828	PWC gp 2 xtra hd seat/back	DME Equipment
К0829	PWC gp 2 xtra hd cap chair	DME Equipment
K0835	PWC gp2 std sing pow opt s/b	DME Equipment
K0836	PWC gp2 std sing pow opt cap	DME Equipment
K0837	PWC gp 2 hd sing pow opt s/b	DME Equipment

Procedure Code	Procedure Code Description	Procedure Code Type
K0838	PWC gp 2 hd sing pow opt cap	DME Equipment
К0839	PWC gp2 vhd sing pow opt s/b	DME Equipment
К0840	PWC gp2 xhd sing pow opt s/b	DME Equipment
K0841	PWC gp2 std mult pow opt s/b	DME Equipment
K0842	PWC gp2 std mult pow opt cap	DME Equipment
К0843	PWC gp2 hd mult pow opt s/b	DME Equipment
K0848	PWC gp 3 std seat/back	DME Equipment
К0849	PWC gp 3 std cap chair	DME Equipment
K0850	PWC gp 3 hd seat/back	DME Equipment
K0851	PWC gp 3 hd cap chair	DME Equipment
K0852	PWC gp 3 vhd seat/back	DME Equipment
K0853	PWC gp 3 vhd cap chair	DME Equipment
K0856	PWC gp3 std sing pow opt s/b	DME Equipment
K0857	PWC gp3 std sing pow opt cap	DME Equipment
K0858	PWC gp3 hd sing pow opt s/b	DME Equipment
K0859	PWC gp3 hd sing pow opt cap	DME Equipment
К0860	PWC gp3 vhd sing pow opt s/b	DME Equipment
K0861	PWC gp3 std mult pow opt s/b	DME Equipment
K0862	PWC gp3 hd mult pow opt s/b	DME Equipment
K0863	PWC gp3 vhd mult pow opt s/b	DME Equipment