Durable Medical Equipment Prosthetics, Orthotics and Supplies (DMEPOS)

Michael Holoman, Senior Provider Enrollment Education Representative, NSC
Session Overview

Following this presentation, the supplier will be able to identify:

- DMEPOS Basics
- Overview of the Supplier Standards
- NSC Reminders
- Resources
DMEPOS Basics

What is the NSC

- National Supplier Clearinghouse
- Developed by CMS to accommodate the specialized enrollment process for Durable Medical Equipment, Prosthetics, Orthotics, and Supplies (DMEPOS) providers
DMEPOS Basics

Primary Responsibility

- Ensure that DMEPOS suppliers meet all Federal and State requirements to bill Medicare
  - Supplier Standards found in 42 CFR 424.57c
  - Provisions in publication 100-08 IOM, Chapter 15 of the Program Integrity Manual (PIM)

Maintain a fraud prevention and detection program
DMEPOS Basics

Enrolling in the Medicare Program

- Submit information to the NSC
  - Must be compliant with ALL Supplier Standards
- CMS-855S
- Application is reviewed and processed
- Site inspection is conducted
- Billing privileges issued if compliance is determined
DMEPOS Basics

What to expect during the site inspection

- Checking compliance with Supplier Standards
- Adhere to posted hours of business
- Make certain that qualified staff is available to answer questions and has accessibility to files and documentation
- Have current licensure & certification prominently displayed
DMEPOS Basics

What to expect during the site inspection

- Be able to provide inspector with accessibility to review Medicare beneficiary files if requested
- Proof of business records including warranties, delivery information, rental agreements
- Sufficient inventory on-site or evidence of contractual agreements for volume of Medicare beneficiaries served
Site inspectors should have the following when visiting your site:

- Proper photo identification
- A laminated letter signed by the NSC Supplier Audit and Compliance Unit Manager stating the purpose of the visit
- Site visit acknowledgement form that the supplier signs attesting that the visit was completed and that any outstanding documentation will be faxed to the inspector (Generally within 48 hours)

*Questionable inspection procedures should be reported to the NSC.
How to Accelerate the Enrollment Process

- Approximately 63% of applications require some level of development
- Use Internet-based PECOS
- Review application before submission (complete in its entirety)
- Submit the fee (includes physicians and non-physician practitioners)
- Include a copy of all applicable federal, state licenses and certifications
DMEPOS Basics

**How to Accelerate the Enrollment Process**

- Include a copy of the certificate of insurance (not a binder)
  - Comprehensive liability insurance (professional liability is not acceptable)
  - Minimum amount of $300,000
  - NSC must be listed as the certificate holder
Definition of Operational

Operational means the provider or supplier has a qualified physical practice location that remains open to the public and properly staffed during posted business hours for the purpose of providing health care related services.

The business is considered non-operational if no one is available at the place of business during routine deliveries or off-site maintenance of supplies or products to Medicare beneficiaries.
Poll Question
Questions...
Overview of the Supplier Standards
Overview of the Supplier Standards

Standard 2

- Changes of Information
  - Report changes to the NSC within 30 days of the change
  - Submitted through PECOS or on the CMS-855S
    - Location changes
    - Products and services
    - Ownership
    - Updating Licensure & Insurance
Overview of the Supplier Standards

Standard 5 & 6

- Warranty Agreements

  - The supplier under applicable State law must repair or replace free of charge items that are under warranty.
  - The supplier must notify the beneficiary that they may rent or purchase inexpensive or routinely purchased items.

    - Although CMS has revised payment rules for capped rental items, supplier standard 5 still applies for inexpensive and routinely purchased items that do not fall into the capped rental category and applicable capped rental items (i.e. complex rehabilitative power wheelchairs and parental/enteral pumps, etc.).
Overview of the Supplier Standards

Standard 9

- Maintains a primary business telephone that is operating at the appropriate site listed under the name of the business locally or toll-free
  - Use of cell phones, beepers, and pagers as the primary business telephone is prohibited
  - Exclusive use of answering machines and answering services as the primary telephone number during posted business hours is prohibited
  - Calls cannot be exclusively forwarded from the primary business telephone to a cell phone or pager
Overview of the Supplier Standards

Standard 11 & 12

- **Beneficiary Contact**
  - The supplier agrees not to initiate telephone contact with the beneficiary unless
    - It is for service or delivery of a covered item
    - If an item has been provided within the last 15 months
    - Beneficiary has given expressed permission
      » Capturing an internet IP address is not considered expressed permission
  - The supplier is responsible for delivering the item to the beneficiary and providing instruction on its usage
Overview of the Supplier Standards

**Medicare Statement**

- May be used to satisfy Standard #16 in lieu of distributing standards to Medicare Beneficiaries.
  - The products and/or services provided to you by (supplier legal business name or DBA) are subject to the supplier standards contained in the Federal regulations shown at 42 Code of Federal Regulations Section 424.57(c). These standards concern business professional and operational matters (e.g. honoring warranties and hours of operation). The full text of these standards can be obtained at [42 CFR 424.57c](#). Upon request we will furnish you a written copy of the standards.
Overview of the Supplier Standards

Standard 22 & 26

- Accreditation
  - Required for all DME suppliers
  - Pharmacy exempt by attestation
  - Pharmacy exempt when billing DME drugs only

- Surety Bond
  - Unrelated to accreditation
  - Required for all DME suppliers
Overview of the Supplier Standards

Standard 29

- Prohibits the sharing of a practice location with any other Medicare provider or supplier, except:
  - Physician or Non-physician practitioner providing services to his or her own patients
  - Physical or Occupational Therapist providing services to his or her own patients
  - Wholly owned DME company by a Part A Provider
    - Hospital
    - Skilled Nursing Facility
    - Home Health Agency
Overview of the Supplier Standards

**Standard 30**

- Requires DMEPOS suppliers to remain open to the public for a minimum of 30 hours per week, except:
  - Physician and non-physician practitioners furnishing services to his or her own patients
  - DMEPOS supplier providing custom made orthotics and prosthetics
Poll Question
Poll Question
Questions...
Policy Updates
Policy Updates

Licensure

- Database on NSC Website is a guide
- What's New
Policy Updates
# Policy Updates

**CA**

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<th>Notes</th>
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<th>Req. suppliers (out-state)</th>
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<td>California Department of Public Health, HMDR Program</td>
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<td>Automatic Ext Defibrillator (AEDS) and/or Supplies (DM01)</td>
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## Policy Updates

### Diabetic Shoes and Inserts (S02)

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<td>AL</td>
<td>Therapeutic Shoe Fitter License</td>
<td>Yes</td>
<td>Y</td>
<td>No</td>
<td>F. Licensure requirement effective March 1, 2014. A licensed Orthotist, Prosthetist/Orthotist or Pedorthist may also provide these items. (Added: 12/12/2013)</td>
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Policy Updates

**Fingerprint Based Background Checks**

- Implemented on August 6, 2014
- 5% or greater owners or partners
- NSC MAC to mail letters to Correspondence Address
- Suppliers can check Accurate Biometrics Website for status: [www.ccmsfingerprinting.com](http://www.ccmsfingerprinting.com)
Poll Question
Questions...
NSC Reminders
NSC Reminders

Each supplier location where Medicare Beneficiaries are serviced must have billing privileges

- Exception
  - Warehouses
  - Repair facilities

- Tax ID Changes
  - NPI
Revalidations

- 42 CFR 424.57 requires every supplier to revalidate every 3 years
- NSC will mail letter to the suppliers’ correspondence address when revalidation is due in a **YELLOW** envelope
- CMS Revalidation List gives 6 month notice
  - [https://data.cms.gov/revalidation](https://data.cms.gov/revalidation)
NSC Reminders

The legal business name as reported with the IRS must match what is listed in NPPES when submitted to the NSC for processing
NSC Reminders

Adverse Legal Actions (ALAs)

- Failure to report will result in denial of application or revocation
NSC Reminders

Medicare Enrollment Fees

- DMEPOS Suppliers
  - CY 2018 - $569
- Credit Card, Debit Card, Electronic Check
- New locations, Additional Locations, Revalidations & Reactivations
  - Applications are not processed until funds are cleared
  
  https://pecos.cms.hhs.gov/pecos/feePaymentWelcome.do
NSC Reminders

Notification of Death

- Report death of associates within 30 days
  - Owners
  - Authorized Officials
  - Delegated Officials

- Stated in 100-08 IOM, Program Integrity Manual, Chapter 15.28.
Poll Question
Resources
## Resources

| **Mailing Address:** | Palmetto GBA  
|                      | National Supplier Clearinghouse  
|                      | P.O. Box 100142  
|                      | Columbia, SC 29202-3142 |

| **Overnight Mailing Address:** | Palmetto GBA  
|                                | National Supplier Clearinghouse AG-490  
|                                | 2300 Springdale Dr., Bldg. 1  
|                                | Camden, SC 29020 |

| **Phone Number:** | (866) 238-9652,  
|                  | M - F 9:00 AM - 5:00 PM, ET |

| **Website:** | [http://www.PalmettoGBA.com/NSC](http://www.PalmettoGBA.com/NSC) |

| **E-mail:** | [Medicare.NSC@PalmettoGBA.com](mailto:Medicare.NSC@PalmettoGBA.com) |
Resources

Social Media: @PalmettoGBA_NSC
Resources

Simply scan the QR code with your wireless device to navigate to the subscription page for the NSC listserv.
Resources

Online Application Status Tool

- **Search by PTAN, NPI, TIN, DCN**
  - [www.palmettogba.com/ns](http://www.palmettogba.com/ns)

- **Interactive Voice Response (IVR) Unit**
  - General information regarding the enrollment process
  - Information on the appeals process
  - Status of applications
  - Instructions on how to obtain a CMS 855S
  - Contact information for the NSC, DME MAC and CMS
    - The IVR is available 24 hours a day, seven days a week (except for routine system maintenance) and can be accessed by calling the NSC Customer Service Line at **(866) 238-9652**
DMEPOS Status Letter

National Supplier Clearinghouse

DMEPOS PTAN Status

Receive an official DMEPOS Enrollment Status Letter.

To request a letter with your current enrollment status information, (similar to the letter that was first issued when you enrolled in the program), please enter your 10-digit PTAN in the field provided and select "Request Letter".

Letters will be mailed to the correspondence address on file with the NSC within 1-2 business days.

Note: This option is only available to suppliers who have already been assigned a DMEPOS PTAN for the location for which they are requesting the letter.

DMEPOS PTAN:

[Input field]

Request Letter  Reset

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Resources

- NSC Web Submission Form
- 855S not required
- PTAN (active or revoked)
Resources

National Supplier Clearinghouse MAC
The National Supplier Clearinghouse is the single organizational entity responsible for issuing or revoking Medicare supplier billing privileges for suppliers of Durable Medical Equipment, Orthotics and Supplies (DMEPOS).

Top Links
- CMS Provides Clarification for Fingerprint-based Background Checks
- Contact Information
- Standards & Compliance
- Appeals Process
- Change of Information Guide

Forms / Tools
- Download a CMS-855S Enrollment Application
- Internet PECOS and Medicare Enrollment Fee
- Licensure Database
- NSC Application Status Tool
- NSC Web Form Submission

New Supplier Enrollment Document
Step by Step Guide to Enrollment

Register for NSC Webinars
Get enrollment updates on demand
Resources

New Supplier DMEPOS Enrollment

- **Step 1:** Obtain a National Provider Identifier (NPI)
  
  Visit [https://nppes.cms.hhs.gov](https://nppes.cms.hhs.gov)

- **Step 2:** Obtain an Accreditation from a CMS approved Organization
  
  Visit [https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/MedicareProviderSupEnroll/DMEPOSAccreditation.html](https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/MedicareProviderSupEnroll/DMEPOSAccreditation.html)

- **Step 3:** Need to have a valid surety bond for $50,000
  
  Visit [https://www.fiscal.treasury.gov](https://www.fiscal.treasury.gov)

- **Step 4:** Valid state license for state(s) services are rendered
  
  Refer to the licensure database for appropriate licensure:
  [www.palmettogba.com/nsc](http://www.palmettogba.com/nsc) Select Licensure Database from tools

- **Step 5:** General Liability Insurance of at least $300,000

- **Step 6:** Adhere to the DMEPOS Supplier Standards
  
  Standards can be located at [www.palmettogba.com/nsc](http://www.palmettogba.com/nsc)
  Select Standards and Compliance then Medicare Durable Medical
Poll Question
Questions...