



Stay of Enrollment

Related Change Request (CR) Information	
Numbers: 13449 Revised & 14148	Release Dates: April 25, 2024 & March 17, 2026
Effective Dates: May 30, 2024 & May 18, 2026	Implementation Dates: May 30, 2024 & May 18, 2026
Transmittal Numbers: R12591PI & R13615OTN	

What's Changed?

We revised this article to add additional scenarios for when a stay of enrollment status may apply to DMEPOS suppliers. We also added the CR 14148 release date, effective date, implementation date, transmittal number, and transmittal link. Substantive content changes are in dark red (pages 1 and 4).

Affected Providers

- Physicians
- Suppliers
- Other providers billing Medicare Administrative Contractors (MACs) for services

Action Needed

Make sure your staff knows about:

- A new provider enrollment status called a stay of enrollment
- Updates to the [Medicare Program Integrity Manual, Chapter 10](#), section 10
- Scenarios where your National Provider Enrollment Contractor (NPE) may apply a stay of enrollment status to DMEPOS suppliers

Key Updates

The [CY 2024 Physician Fee Schedule](#) final rule contains provisions about Medicare provider enrollment. One of these provisions is creating a new provider enrollment status CMS labeled as a “stay of enrollment.”

Stay of Enrollment

Stay of enrollment is an action that’s less burdensome on providers and suppliers than deactivating or revoking your Medicare enrollment. A stay of enrollment (or “stay”) is a preliminary, interim status representing a pause in enrollment.

Requirements for a Stay 2-Step Test

There are 2 steps for implementing a stay per [42 CFR 424.541](#).

The provider:

1. Is non-compliant with at least 1 Medicare enrollment requirement.
2. Can remedy the non-compliance by submitting a [Medicare enrollment application](#) or an [Electronic Funds Transfer \(EFT\) Authorization Agreement](#), as applicable. We refer to these forms as applicable CMS forms (ACFs).

If the provider can’t correct the type of non-compliance involved by submitting an ACF, we **can’t** impose a stay.

Examples of how this 2-step works include:

- A provider failed to timely report a change in its address from 10 Smith Street to 20 Smith Street
- A supplier didn’t respond to a revalidation request
- A DMEPOS supplier didn’t report deleting a managing employee
- A physician didn’t timely report a change in their practice location’s ZIP Code
- A Medicare Diabetes Prevention Program supplier failed to timely report a change in the address of an organizational owner
- An independent diagnostic testing facility failed to comply with a supplier standard, but it can reach compliance by submitting an ACF

In these examples, the provider failed to adhere to a reporting, revalidation, or supplier standard requirement, but they could resume compliance by submitting the ACF. This example list isn’t exhaustive as there are many scenarios in which a stay could apply.

Key Points of a Stay

- You remain enrolled in Medicare during the stay
- We reject claims you submit with dates of service within the stay period
- Your stay of enrollment lasts no longer than 60 days
- We can impose a stay of less than 60 days
- A stay ends on the earlier of the following dates:
 - The date when we or your contractor decides you resume compliance with all Medicare enrollment requirements
 - The day after the imposed stay period expires
- A stay isn't considered an adverse legal action of any kind
- We may impose a stay multiple times for separate instances of non-compliance (for example, a stay in June 2024 and another stay in December 2025)

Letters

Your MAC will send all stay notification letters by hard-copy mail and email if you have a valid email address available. They'll also send the notice via fax if available. We'll mail all notification letters on the same date listed on the letter.

Rebuttals

You may file a rebuttal under a stay of enrollment, which is an opportunity for you to show that you met all applicable enrollment requirements and that we shouldn't have imposed the stay. You may submit only 1 rebuttal request per enrollment stay.

If we get the applicable ACF for your stay while a rebuttal submission is pending or during the rebuttal submission timeframe, your MAC will process the ACF consistent with current instructions.

Your MAC will handle all non-DMEPOS supplier stay rebuttals consistent with the instructions in CR 13449.

Additional Scenarios

CR 14148 provides the NPE and DMEPOS suppliers with additional scenarios in which the NPE may apply a stay status to DMEPOS suppliers, including liability insurance and surety bond cancellations, and site visit non-compliance determinations. In these instances, the NPE:

- Must issue a single, comprehensive development request to the provider if any information is missing, incomplete, or deficient. You'll have 30 days to respond to the development request unless our guidance states otherwise. If you don't respond within 30 days:
 - For change of information and revalidation applications, the NPE will apply the stay status in PECOS, which will last for 30 days, and will mail you a letter. If you still don't respond during your 30-day stay status, the NPE will proceed with revocation.
 - For initial and reactivation applications, the NPE will deny the application without applying a stay status.
- Will apply the stay status for 30 days for any stand-alone surety bond or liability insurance cancellations. The NPE won't apply the stay if there's a pending application in house updating the surety bond or liability information.
- Must take the appropriate administrative action (revocation or denial) when you submit a response to a development request or stay they can't approve or fails to demonstrate full compliance with the underlying non-compliance issue.

More Information

We issued CR 13449 and CR 14148 to your MAC and NPE as the official instructions for this change. See the [Medicare Program Integrity Manual, Chapter 10](#), section 10.4.9 for more details on stays.

For more information, find your [MAC's website](#).

Document History

Date of Change	Description
March 17, 2026	We revised this article to add additional scenarios for when a stay of enrollment status may apply to DMEPOS suppliers. We also added the CR 14148 release date, effective date, implementation date, transmittal number, and transmittal link. Substantive content changes are in dark red (pages 1 and 4).
April 25, 2024	We revised the effective and implementation dates and the web address of CR 13449.
March 4, 2024	Initial article released.

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