

<b>CMS Manual System</b>	<b>Department of Health &amp; Human Services (DHHS)</b>
<b>Pub 100-20 One-Time Notification</b>	<b>Centers for Medicare &amp; Medicaid Services (CMS)</b>
<b>Transmittal 13615</b>	<b>Date: March 17, 2026</b>
	<b>Change Request 14148</b>

**SUBJECT: Durable Medical Equipment, Prosthetics, Orthotics and Supplies (DMEPOS) Stay of Enrollment**

**I. SUMMARY OF CHANGES:** The purpose of this Change Request (CR) is to provide guidance on scenarios in which a Stay of Enrollment shall be applied to Durable Medical Equipment, Prosthetics, Orthotics and Supplies (DMEPOS) supplier enrollments.

**EFFECTIVE DATE: May 18, 2026**

*\*Unless otherwise specified, the effective date is the date of service.*

**IMPLEMENTATION DATE: May 18, 2026**

*Disclaimer for manual changes only: The revision date and transmittal number apply only to red italicized material. Any other material was previously published and remains unchanged. However, if this revision contains a table of contents, you will receive the new/revise information only, and not the entire table of contents.*

**II. CHANGES IN MANUAL INSTRUCTIONS:** (N/A if manual is not updated)

R=REVISED, N=NEW, D=DELETED-Only One Per Row.

<b>R/N/D</b>	<b>CHAPTER / SECTION / SUBSECTION / TITLE</b>
N/A	N/A

**III. FUNDING:**

**For Medicare Administrative Contractors (MACs):**

The Medicare Administrative Contractor is hereby advised that this constitutes technical direction as defined in your contract. CMS does not construe this as a change to the MAC Statement of Work. The contractor is not obligated to incur costs in excess of the amounts allotted in your contract unless and until specifically authorized by the Contracting Officer. If the contractor considers anything provided, as described above, to be outside the current scope of work, the contractor shall withhold performance on the part(s) in question and immediately notify the Contracting Officer, in writing or by e-mail, and request formal directions regarding continued performance requirements.

**IV. ATTACHMENTS:**

**One Time Notification**

# Attachment - One-Time Notification

Pub. 100-20	Transmittal: 13615	Date: March 17, 2026	Change Request: 14148
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**II. GENERAL INFORMATION**

**A. Background:** In the Calendar Year 2024 Physician Fee Schedule final rule (CMS-1784-F), CMS established a new provider enrollment status in 42 CFR § 424.541 labeled a “stay of enrollment.” The purpose was to create a CMS action that would be less burdensome on providers/suppliers (hereafter collectively “provider,” except as otherwise noted) than a deactivation or revocation. It represents a middle ground between (1) a deactivation and (2) non-action on CMS’ part. It gives CMS greater flexibility to take appropriate, fair, and reasonable measures commensurate with the degree of the provider’s non-compliance. A stay of enrollment (SoE or simply “stay”) is a preliminary, interim status---prior to any subsequent deactivation or revocation---that would represent, in a sense, a “pause” in enrollment, during which the provider would nonetheless remain enrolled in Medicare. In this vein, CMS would neither formally nor informally treat the stay as a sanction or adverse action for purposes of Medicare enrollment.

Stay of Enrollment implementation is outlined in section 10.4.9 in Chapter 10 of the CMS Pub. 100-08 Medicare Program Integrity Manual. This CR outlines additional scenarios in which a stay of enrollment status shall be applied to Durable Medical Equipment, Prosthetics, Orthotics and Supplies (DMEPOS) supplier enrollments.

**B. Policy:** 42 CFR § 424.541 Stay of enrollment.

**III. BUSINESS REQUIREMENTS TABLE**

*"Shall" denotes a mandatory requirement, and "should" denotes an optional requirement.*

Number	Requirement	Responsibility								
		A/B MAC			DM E  MA C	Shared-System Maintainers				Other
		A	B	HH H		FIS S	MC S	VM S	CW F	
14148.1	The Contractor shall adhere to SoE implementation and removal timeframes outlined in section 10.4.9 in Chapter 10 of the CMS Pub. 100-08 Medicare									NPEAST , NPWES T

Number	Requirement	Responsibility									
		A/B MAC			DM E MA C	Shared-System Maintainers				Other	
		A	B	HH H		FIS S	MC S	VM S	CW F		
	Program Integrity Manual.										
14148.2	The Contractor shall complete a preliminary review of the application within the first ten (10) calendar days from receipt.									NPEAST , NPWES T	
14148.2.1	The Contractor shall complete the preliminary review, which must include at a minimum: <ul style="list-style-type: none"> <li>• Verifying exclusion status via SAM/OIG</li> <li>• Reviewing ownership and managing control information (Sections 5/6)</li> <li>• Verifying accreditation, if applicable</li> </ul>									NPEAST , NPWES T	
14148.3	The Contractor shall place the application into a Stop-the-Clock (STC) status upon ordering background check fingerprints (FP) and/or a site visit (SV).										NPEAST , NPWES T
14148.3.1	The Contractor shall not proceed with further application review or take administrative action while the application is in FP/SV STC, unless the supplier initiates contact providing supplemental information.										NPEAST , NPWES T
14148.3.2	The Contractor shall keep the timeliness clock paused until it receives both FP and SV results when both are requested, or until it receives the results for whichever review was										NPEAST , NPWES T

Number	Requirement	Responsibility								
		A/B MAC			DM E  MA C	Shared-System Maintainers				Other
		A	B	HH H		FIS S	MC S	VM S	CW F	
	requested.									
14148.4	<p>The Contractor shall recommence the application timeliness clock only upon receipt of all requested results:</p> <ul style="list-style-type: none"> <li>• Site Visit (SV) results</li> <li>• Fingerprint (FP) results (or confirmation of non-submission)</li> </ul>								NPEAST , NPWEST	
14148.5	The Contractor shall conduct a complete and full application review prior to making a final determination after receipt of SV and/or FP results.								NPEAST , NPWEST	
14148.5.1	<p>The Contractor shall ensure that the review includes:</p> <ul style="list-style-type: none"> <li>• Evaluating all SV findings</li> <li>• Assessing the FP results</li> <li>• Reviewing all sections of the CMS-855 application</li> <li>• Verifying compliance with 42 CFR §424.57, PIM Chapter 10, and all other CMS guidance</li> </ul>								NPEAST , NPWEST	
14148.6	The Contractor shall issue a single, comprehensive development request covering all identified issues if the SV report or application indicates missing, incomplete, or								NPEAST , NPWEST	

Number	Requirement	Responsibility								Other
		A/B MAC			DM E MA C	Shared-System Maintainers				
		A	B	HH H		FIS S	MC S	VM S	CW F	
	deficient information.									
14148.6.1	The Contractor shall not issue multiple, overlapping development requests for the same application.									NPEAST , NPWES T
14148.6.2	The Contractor shall provide a thirty (30) calendar day development response period for all development requests, unless CMS guidance states otherwise, and shall issue the requests using the standard communication channel.									NPEAST , NPWES T
14148.7	The Contractor shall apply an SoE only for COI and Revalidation applications when the supplier does not respond to development within the required timeframe.									NPEAST , NPWES T
14148.7.1	The Contractor shall maintain the SoE for thirty (30) calendar days.									NPEAST , NPWES T
14148.8	The Contractor shall switch the PECOS status to "Approved - Stay of Enrollment" effective the date the SoE letter is mailed.									NPEAST , NPWES T
14148.9	The Contractor shall apply the SoE prior to finalizing the SV results. The contractor shall then finalize the SV results based on the information received from the supplier, or mark the SV as failed if no development response is received.									NPEAST , NPWES T

Number	Requirement	Responsibility								
		A/B MAC			DM E  MA C	Shared-System Maintainers				Other
		A	B	HH H		FIS S	MC S	VM S	CW F	
14148.10	The Contractor shall proceed with revocation within ten (10) days if a response is not received before the SoE expiration date.									NPEAST , NPWES T
14148.10.1	The Contractor shall ensure the revocation reflects all identified areas of noncompliance, including SV, FP, and application-based deficiencies.									NPEAST , NPWES T
14148.11	The Contractor shall deny the application without applying a SoE for initial and reactivation applications if the supplier fails to respond to development,									NPEAST , NPWES T
14148.11.1	The Contractor shall ensure the denial reflects all identified areas of noncompliance, including SV, FP, and document-based deficiencies.									NPEAST , NPWES T
14148.12	The Contractor shall apply the thirty (30) calendar day SoE for standalone surety bond and liability insurance cancellations. A “standalone cancellation” is the revocation action resulting from a cancellation of a surety bond or liability insurance that is not accompanied by any additional enrollment deficiencies or non-compliance matters.									NPEAST , NPWES T
14148.12.1	The Contractor shall apply the SoE for standalone post-dated surety bond cancellation notifications									NPEAST , NPWES T

Number	Requirement	Responsibility								
		A/B MAC			DM E  MA C	Shared-System Maintainers				Other
		A	B	HH H		FIS S	MC S	VM S	CW F	
	within 10 days of receipt.									
14148.12. 2	The Contractor shall apply the SoE for all standalone future-dated surety bond cancellation notifications within 10 days after the cancellation effective date.									NPEAST , NPWES T
14148.12. 3	The Contractor shall apply the SoE for all standalone future-dated liability insurance cancellation notifications within 10 days after the cancellation effective date.									NPEAST , NPWES T
14148.12. 4	The Contractor shall apply the SoE for all standalone post-dated liability insurance cancellation notifications within 10 days of receipt.									NPEAST , NPWES T
14148.12. 5	The contractor shall accept standalone surety bond certificates and liability insurance certificates unaccompanied by the CMS-855S as an applicable CMS form (ACF).									NPEAST , NPWES T
14148.12. 6	The Contractor shall create a new L&T to apply the SoE and apply STC to the open application L&T.									NPEAST , NPWES T
14148.13	The Contractor shall not apply the SoE if there is a pending application in-house updating the standalone surety bond information or liability insurance information.									NPEAST , NPWES T
14148.14	The Contractor shall take the appropriate administrative action (revocation or denial) when									NPEAST , NPWES T

Number	Requirement	Responsibility								
		A/B MAC			DM E  MA C	Shared-System Maintainers				Other
		A	B	HH H		FIS S	MC S	VM S	CW F	
	the supplier submits a response to the development request or SoE that cannot be approved or fails to demonstrate full compliance with the underlying non-compliance issue.									

**IV. PROVIDER EDUCATION**

Medicare Learning Network® (MLN): CMS will develop and release national provider education content and market it through the MLN Connects® newsletter shortly after we issue the CR. MACs shall link to relevant information on your website and follow IOM Pub. No. 100-09 Chapter 6, Section 50.2.4.1 for distributing the newsletter to providers. When you follow this manual section, you don't need to separately track and report MLN content releases. You may supplement with your local educational content after we release the newsletter.

**Impacted Contractors:** NPE

**V. SUPPORTING INFORMATION**

**Section A: Recommendations and supporting information associated with listed requirements:** N/A

*"Should" denotes a recommendation.*

X-Ref Requirement Number	Recommendations or other supporting information:

**Section B: All other recommendations and supporting information:** N/A

**VI. CONTACTS**

**Post-Implementation Contact(s):** Contact your Contracting Officer's Representative (COR).

**VII. FUNDING**

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**ATTACHMENTS: 0**