

59 Million Patients, 2 Million Providers, ONE Mission

# Durable Medical Equipment Prosthetics, Orthotics and Supplies (DMEPOS) Michael Holoman, Senior Provider Enrollment Education Representative, NSC





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

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



#### 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



#### **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



#### **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



#### 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



#### 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 it's entirety)
- Submit the fee (includes physicians and non-physician practitioners)
- Include a copy of all applicable federal, state licenses and certifications



#### **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...









#### 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



#### 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.).



#### **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



#### **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



#### 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 <u>42 CFR 424.57c</u>. Upon request we will furnish you a written copy of the 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



#### 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



#### 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**

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## **Poll Question**

#### Questions...







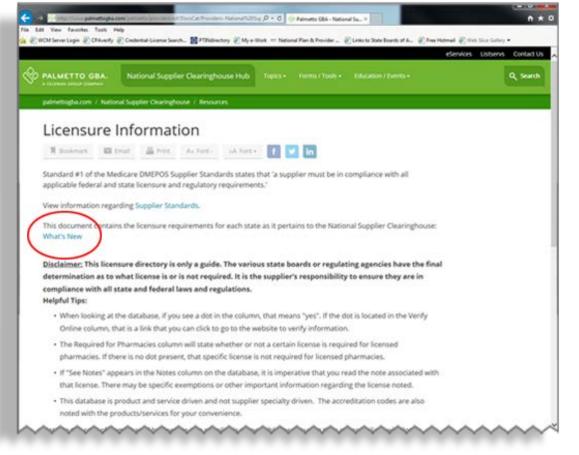
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#### **Policy Updates**

#### Licensure

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





#### DMEPOS STATE LICENSE DIRECTORY



DMEPOS LICENSE DIRECTORY State/Territory TMap Filter Product/Services: T

CA

Jump to a Product/Service:

	Req.suppliers (out-state)	Licensing Agency	Verify Online	Req. for Pharmacies (in- state)	Notes			
Automatic Ext Defibrillator (A	EDS) and/or S	Supplies (DM01)						
Home Medical Device Retailer license	Yes	California Department of Public Health, HMDR Program		No				
Home Medical Device Retailer Exemptee License	No	California Department of Public Health, HMDR Program		No	D			
Blood Glucose Monitors/ Supplies (Non-Mail Order) (DM05)								
Home Medical Device Retailer License	No	California Department of Public Health, HMDR Program		No				

DMEPOS STATE LICENSE DIRECTORY State Map 📇 🙆

Please Select:

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#### Diabetic Shoes and Inserts (S02)

State	License Name	Req Out of State	Online Verification	Req Pharmacies	Notes
AK	No License Required	No	-	No	
AL	Therapeutic Shoe Fitter License	Yes	Y	No	F: Licensure requirement effective March 1, 2014. A licensed Orthotist, Prosthetist/Orthotist or Pedorthist may also provide these items. (Added: 12/12/2013)
AR	No License Required	No	-	No	
AS	No License Required	No	-	No	
AZ	No License Required	No	-	No	
CA	No License Required	No	-	No	



#### **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: <u>www.cmsfingerprinting.com</u>



## **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

#### NSC Reminders

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#### **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
  - <u>https://data.cms.gov/revalidation</u>



# 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 <u>https://pecos.cms.hhs.gov/pecos/feePaymentWelcome.do</u>

# 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**

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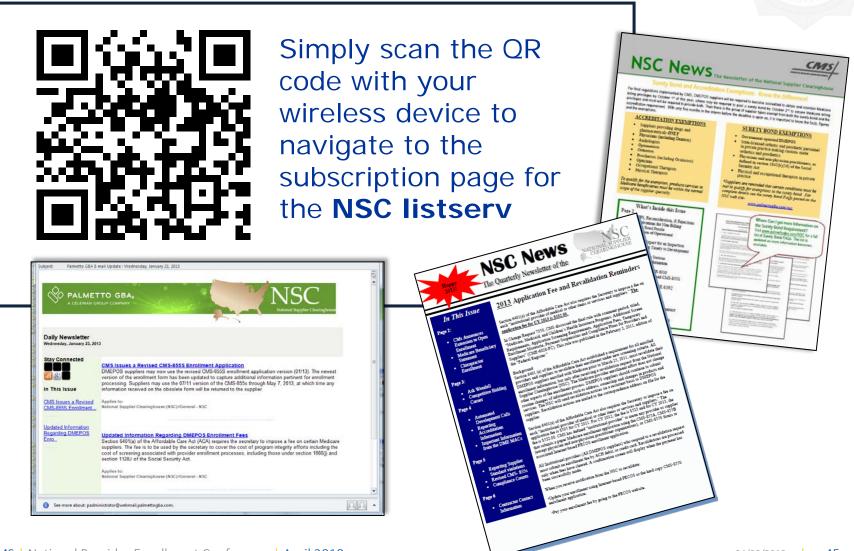
Mailing Address:	Palmetto GBA National Supplier Clearinghouse P.O. Box 100142 Columbia, SC 29202-3142
<b>Overnight Mailing Address:</b>	Palmetto GBA National Supplier Clearinghouse AG-490 2300 Springdale Dr., Bldg. 1 Camden, SC 29020
Phone Number:	(866) 238-9652 <i>,</i> M - F 9:00 AM - 5:00 PM, ET
Website:	http://www.PalmettoGBA.com/NSC
E-mail:	Medicare.NSC@PalmettoGBA.com



Social Media :



#### @PalmettoGBA\_NSC





# **Online Application Status Tool**

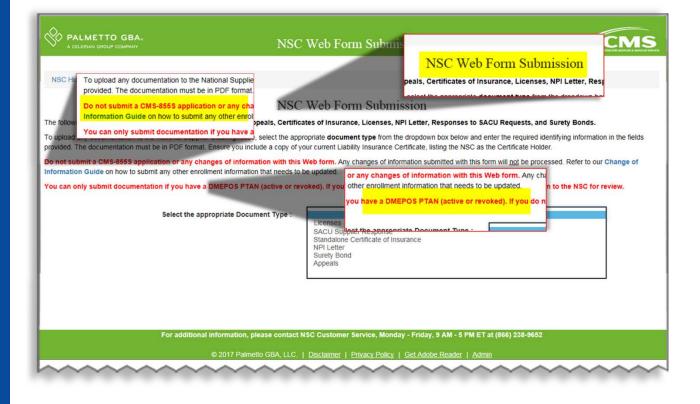
- Search by PTAN, NPI, TIN, DCN
  - www.palmettogba.com/nsc
- Interactive Voice Response (IVR) Unit
  - General information regarding the enrollment process
  - Information on the appeals process
  - Status of applications
  - Instructions on how to obtain a CMS 855S
  - Contact information for the NSC, 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**

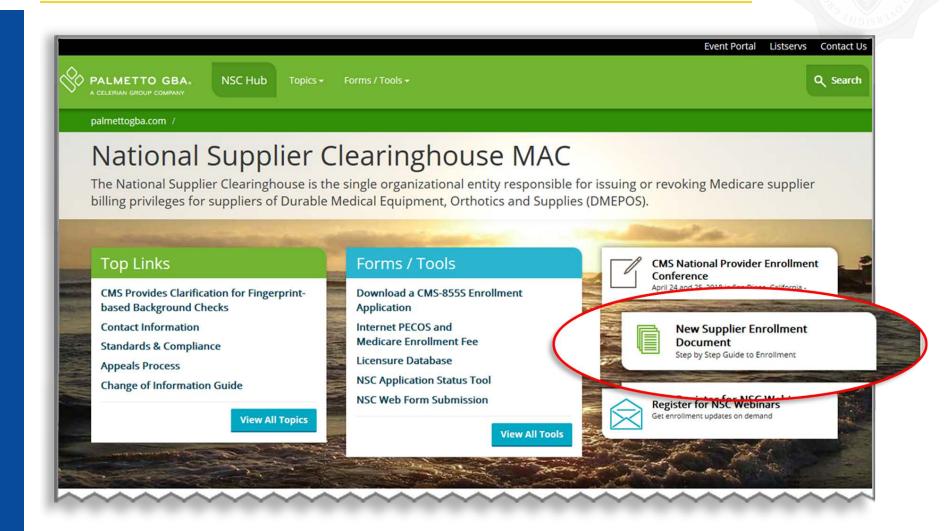
A CELERIAN GROUP COMPANY MEDICARE HOME CONTACT US E-MAIL U	UPDATES search G	CONTROL FOR HELDICARE & HELDICARD SERVICES
National Supplier Clearinghous	se	
DMEPOS PTAN Status		
Receive an official DMEPOS Enrollment Status Letter.		
To request a letter with your current enrollment status information, (sim letter that was first issued when you enrolled in the program), please en 10-digit PTAN in the field provided and select "Request Letter".		
Letters will be mailed to the correspondence address on file with the NSC 1-2 business days.	C within	
Note: This option is only available to suppliers who have already been a DMEPOS PTAN for the location for which they are requesting the letter.	ssigned a	
DMEPOS PTAN: Request Letter Reset		



 NSC Web Submission Form

- 855S not required
- PTAN (active or revoked)









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# Questions...



