



Frequently Asked Questions From DMEPOS Providers

Presented by:
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Overview

- Topics/Questions most asked
- Regulatory
- CMS
- Accreditation
- Q&A

- Presenters:
 - Cindy Roberts BS, RRT, RPFT, RCP - Clinical Review
 - Tim Safley, MBA, RRT, RCP - ACHC Program Director
 - Kris Ravotti, RRT, RCP – Clinical Compliance Educator

Regulatory Questions



In which states must I have a license?

- Each state has different licensure/registration/certification, etc. requirements for the provision of DMEPOS products, handling of oxygen, sterilization of upholstered items, and when licensed healthcare professionals must be used.
- Consult each state licensure board and the NSC list of required licenses to determine required licensure.

<https://www.palmettogba.com/palmetto/npewest.nsf/DID/P4LF7PNQM8?Open>

How do I determine the requirements for each state that I ship product to?

- Each state will determine if out of state providers are required to obtain licensure to distribute DMEPOS products into the state.
- Consult each state licensure board and the NSC/NP list of required licenses to determine required licensure.

<https://www.palmettogba.com/palmetto/npewest.nsf/DID/P4LF7PNQM8?Open>

When is a respiratory therapist (RT) needed to do respiratory equipment setup, PAP mask fits, etc.?

- The requirement for an RT or RN to do setups, mask fits, etc., is based on state regulations. Consult the regulatory board for the practice of respiratory care in your state.
- Usually, the state board regulating the practice of respiratory care can be located at the NSCNP licensure website as well.

<https://www.palmettogba.com/palmetto/npewest.nsf/DID/P4LF7PNQM8?Open>

CMS Questions



What are the DMEPOS Quality Standards?

- The DMEPOS Quality Standards are standards created by CMS that DMEPOS providers must comply with in order to attain accreditation.
- Accrediting organizations must have standards that address all the Quality Standards.

<https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/DMEPOSQuality/DMEPOSQualBooklet-905709.html>

What are the DMEPOS Supplier Standards?

- The DMEPOS Supplier Standards are standards created by CMS that DMEPOS providers must comply with.
- DMEPOS Supplier Standards must be provided to Medicare beneficiaries
 - <https://www.palmettogba.com/palmetto/NSC.nsf/DIDC/7GLS7Z1267~Supplier%20Enrollment~Standards%20and%20Compliance>
 - [https://www.palmettogba.com/Palmetto/Providers.Nsf/files/abbreviatedstandards020816.pdf/\\$File/abbreviatedstandards020816.pdf](https://www.palmettogba.com/Palmetto/Providers.Nsf/files/abbreviatedstandards020816.pdf/$File/abbreviatedstandards020816.pdf)

What is a surety bond, and do I need one?

- In 2009, CMS implemented a requirement for most DMEPOS suppliers to obtain a surety bond prior to applying for accreditation and enrolling for Medicare billing in order to reduce billing fraud and abuse.
 - Surety bonds provide CMS an avenue to recover funds if suppliers are found non-compliant with billing requirements.
- DMEPOS suppliers must maintain a \$50,000 surety bond for each practice location with an NPI number.
- Surety bonds are required by DMEPOS Supplier Standards and CMS has released a surety bond FAQ.
- DMEPOS Supplier Standards
 - <https://www.palmettogba.com/palmetto/NSC.nsf/DIDC/7GLS7Z1267~Supplier%20Enrollment~Standards%20and%20Compliance>
 - [https://www.palmettogba.com/Palmetto/Providers.Nsf/files/abbreviatedstandards020816.pdf/\\$File/abbreviatedstandards020816.pdf](https://www.palmettogba.com/Palmetto/Providers.Nsf/files/abbreviatedstandards020816.pdf/$File/abbreviatedstandards020816.pdf)
- NSC/NP Surety Bond FAQ
 - [https://www.palmettogba.com/palmetto/providers.nsf/files/suretybondfaqs.pdf/\\$FILE/suretybondfaqs.pdf](https://www.palmettogba.com/palmetto/providers.nsf/files/suretybondfaqs.pdf/$FILE/suretybondfaqs.pdf)

How do I know if I am exempt from surety bond requirements?

- [https://www.palmettogba.com/Palmetto/Providers.Nsf/files/SuretyBondexemptionchart01212021.pdf/\\$File/SuretyBondexemptionchart01212021.pdf](https://www.palmettogba.com/Palmetto/Providers.Nsf/files/SuretyBondexemptionchart01212021.pdf/$File/SuretyBondexemptionchart01212021.pdf)
- Great link for reviewing exemptions

Supplier Type/Specialty	Exempt from Accreditation	Exempt from Surety Bond	*Additional Surety Bond Exemption Criteria (All criteria listed for specialty must be met in order to be exempt from the Surety Bond requirement)
Hospital	N	N	
Medical Supply Company	N	N	
Federally or Tribally-owned Indian Health Services	N	Y	
Government-operated DMEPOS Suppliers	N	Y	If the DME supplier has provided CMS with a comparable surety bond under State law. CMS must be listed as the Obligee on the bond.
Occupational/Physical Therapists	Y	Y	1.) The business is solely-owned and operated by the OT/PT; 2.) The items are furnished only to the OT/PT's own patients as part of his/her professional service; and 3.) The business is only billing for orthotics, prosthetics, and supplies
Opticians	Y	N	
Orthotists/Prosthetists	Y	Y	1.) The O/P personnel are in private practice; 2.) The business is making custom-made orthotics and/or prosthetics; 3.) The business is solely-owned and operated by the O/P personnel; and 4.) The business is only billing for orthotics, prosthetics, and supplies
Pharmacies (exempt from accreditation only if providing drugs covered by the DME benefit)	Y	N	

How much liability insurance do I need?

- CMS requires DMEPOS suppliers to maintain comprehensive liability insurance of at least \$300,000 that covers both the supplier's place of business, employees, and customers.
- If the supplier manufactures its own products, the insurance must cover product liability and completed operations.

[https://www.palmettogba.com/Palmetto/Providers.Nsf/files/abbreviatedstandards020816.pdf/\\$File/abbreviatedstandards020816.pdf](https://www.palmettogba.com/Palmetto/Providers.Nsf/files/abbreviatedstandards020816.pdf/$File/abbreviatedstandards020816.pdf)

Can I utilize a cell phone as my business phone or transfer my business phone to my cell phone?

- DMEPOS Supplier Standards require all suppliers to maintain a primary business telephone listed under the name of the business in a local directory or a toll-free number available through directory assistance.
- The exclusive use of a beeper, answering machine, answering service or cell phone during posted business hours is prohibited.

[https://www.palmettogba.com/Palmetto/Providers.Nsf/files/abbreviatedstandards020816.pdf/\\$File/abbreviatedstandards020816.pdf](https://www.palmettogba.com/Palmetto/Providers.Nsf/files/abbreviatedstandards020816.pdf/$File/abbreviatedstandards020816.pdf)

Do I need to have product on site for my first survey?

- DMEPOS Supplier Standards require suppliers to fill orders from its own inventory or to contract with other companies to do so.
- If inventory is not on site, you will need to show a contract, line of credit, or other agreement with a vendor showing that the product can be ordered/obtained in time to fulfill the order.

[https://www.palmettogba.com/Palmetto/Providers.Nsf/files/abbreviatedstandards020816.pdf/\\$File/abbreviatedstandards020816.pdf](https://www.palmettogba.com/Palmetto/Providers.Nsf/files/abbreviatedstandards020816.pdf/$File/abbreviatedstandards020816.pdf)

How do I know what product codes match which HCPCS codes?


- <https://dmepdac.com/palmetto/PDACv2.nsf/DID/43Z2ZKZ02X>

HCPCS to Product and Service Code Crosswalk

Reports

2022	2021	2020	2019	2018
<ul style="list-style-type: none"> • Quarter 1 • Quarter 2 • Quarter 3 	<ul style="list-style-type: none"> • Quarter 1 • Quarter 2 • Quarter 3 • Quarter 4 	<ul style="list-style-type: none"> • Quarter 1 • Quarter 2 • Quarter 3 • Quarter 4 	<ul style="list-style-type: none"> • Quarter 1 • Quarter 2 • Quarter 3 • Quarter 4 	<ul style="list-style-type: none"> • Quarter 1 • Quarter 2 • Quarter 3 • Quarter 4

Crosswalk

HCPCS to Product and Service Code Crosswalk Sorted by: HCPCS, Product and Service Code, Crosswalk Effective Date  PALMETTO GBA <small>A CELERIAN GROUP COMPANY</small>					
HCPCS	HCPCS Long Description	Policy Group Number	Policy Group Name	Product and Service Code	Product and Service Code Desc
A4216	STERILE WATER, SALINE AND/OR DEXTROSE, DILUENT/FLUSH, 10 ML	560	UROLOGICAL SUPPLIES	PD09	UROLOGICAL SUPPLIES
A4217	STERILE WATER/SALINE, 500 ML	560	UROLOGICAL SUPPLIES	PD09	UROLOGICAL SUPPLIES
A4218	STERILE SALINE OR WATER, METERED DOSE DISPENSER, 10 ML	330	NEBULIZERS & RELATED DRUGS	R07	NEBULIZER EQUIPMENT AND/OR
A4221	SUPPLIES FOR MAINTENANCE OF NON-INSULIN DRUG INFUSION CATHETER, PER WEEK (LIST DRUGS SEPARATELY)	290	INFUSION PUMPS & RELATED DRUGS	DM24	EXTERNAL INFUSION PUMP SUP
A4222	INFUSION SUPPLIES FOR EXTERNAL DRUG INFUSION PUMP, PER CASSETTE OR BAG (LIST DRUGS SEPARATELY)	290	INFUSION PUMPS & RELATED DRUGS	DM24	EXTERNAL INFUSION PUMP SUP
A4224	SUPPLIES FOR MAINTENANCE OF INSULIN INFUSION CATHETER, PER WEEK	290	INFUSION PUMPS & RELATED DRUGS	DM25	INSULIN INFUSION PUMP SUPPL
A4225	SUPPLIES FOR EXTERNAL INSULIN INFUSION PUMP, SYRINGE TYPE CARTRIDGE, STERILE, EACH	290	INFUSION PUMPS & RELATED DRUGS	DM25	INSULIN INFUSION PUMP SUPPL
A4226	SUPPLIES FOR MAINTENANCE OF INSULIN INFUSION PUMP WITH DOSAGE RATE ADJUSTMENT USING THERAPEUTIC CONTINUOUS GLUCOSE SENSING, PER WEEK	290	INFUSION PUMPS & RELATED DRUGS	DM24	EXTERNAL INFUSION PUMP SUP
	REPLACEMENT BATTERY, ALKALINE (OTHER THAN J CELL), FOR USE WITH MEDICALLY NECESSARY HOME				

Accreditation Questions



Do I need 24/7 service coverage?

- ACHC and DMEPOS Quality Standards require after hour coverage based on the products/services being provided.
- If respiratory products are being provided, 24/7 coverage is required.
 - Many states have their own requirements for after hour coverage. State regulations should be reviewed.

<https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/DMEPOSQuality/DMEPOSQualBooklet-905709.html>

Does my equipment technician need any special training or competency?

- Anyone who maintains and tests equipment for proper function or performs repairs will need documented training and competency to do so.
- For warranty or manufacturer approved repairs, proof of training by the manufacturer will be needed by at least one technician.
 - Others may have documentation of training and competency to do so unless not permitted by the manufacturer.
- For RTS providers, Quality Standards dictate that repair technicians are trained by manufacturers and complete at least 10 hours annually of continuing education specific to rehabilitation technology.
 - <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/DMEPOSQuality/DMEPOSQualBooklet-905709.html>

How do I obtain feedback from referrals and/or employees for Performance Improvement (PI)?

- There are many ways to obtain feedback. Feedback can be obtained in the form of:
 - Surveys
 - Phone calls
 - Communications during evaluations or visits
 - Via hotlines
 - A variety of other means.

I've switched to electronic records. How long do I need to keep the paper originals?

- ACHC does not require that you keep paper copies once you update to electronic records.
- Check the requirements for each state you service to determine if you are required to keep paper copies.

How often must I do concentrator checks?

- Concentrator checks should be done per your policy and procedures and should be done at minimum per the manufacturer's guidelines/recommendations.

How can I make sure my P&Ps meet ACHC standard requirements?

- Contact ACHCU to purchase a customized P&P manual for your company.
 - <https://achcu.com/>
- Contact your Account Advisor to purchase an extended policy review for an ACHC review of your policy and procedure manual.

Can I provide the new patient packet via my website?

- Documentation provided to the client/patient is defined as either providing written documentation or written instructions on how to find the information on the organization's website.
- If the client/patient does not have access to the website or requests a written copy, written documentation is to be provided
- Proof of receipt is to be documented in the client/patient record.

Questions?





Join Our Exclusive LinkedIn Group for ACHC DMEPOS Accredited Providers

<https://www.linkedin.com/groups/14135028/>



Thank you!