



## Requirement to Report DMEPOS Licensure, Product, & Service Changes

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### Provider Types Affected

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This MLN Matters Article is for all Durable Medical Equipment, Prosthetics, Orthotics, & Supplies (DMEPOS) suppliers submitting claims to Durable Medical Equipment Medicare Administrative Contractors (DME MACs) for DMEPOS items and supplies provided to Medicare patients.

### What All DMEPOS Suppliers Need to Know

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This article informs you about the requirement to update your Medicare enrollment record with changes to the products or services for which you bill Medicare. Also, you must report changes to applicable DMEPOS licensure information.

- Submit your changes to products, services, and DMEPOS licensure information using the web-based [Provider Enrollment, Chain, and Ownership System \(PECOS\)](#) or the [CMS-855S](#) application to update your enrollment record.
- You must report any changes in information (via PECOS or the CMS-855S application) within 30 days of the change, as CMS established in [42 CFR 424.57\(c\)\(2\)](#). This includes all changes to information located on a DMEPOS supplier's enrollment record, including changes unrelated to licensure, products, or services.

This article highlights changes pertaining to licensure, products, and services.

**NOTE: The example featured in the background section of this MLN article is specific to DMEPOS suppliers that supply OR01 (Orthoses: Custom Fabricated) and OR02 (Orthoses: Prefabricated (non-custom fabricated)) items under the prosthetic/orthotics specialty. However, the supplier standard we established at [42 CFR 424.57\(c\)\(1\)](#) requires all DMEPOS suppliers acquire, maintain, and report the appropriate licensure for all items and supplies they provide to Medicare patients per applicable federal and state licensure and regulatory requirements.**

## Background

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You must comply with all supplier standards at [42 CFR 424.57\(c\)](#) to enroll in the Medicare program. Further, you must continue to comply with all of the supplier standards to maintain enrollment.

The standard at [42 CFR 424.57\(c\)\(1\)](#) requires you to operate your business and furnish Medicare-covered items in compliance with applicable federal and state licensure and regulatory requirements. Accordingly, the DMEPOS enrollment contractor, the National Supplier Clearinghouse (NSC), validates that you have the appropriate license in each state where you enroll to provide services.

If a state indicates that a physician, non-physician practitioner, or personnel with specialized training must provide a specific DMEPOS item, Medicare will only make a payment when an individual with the required training and licensure provides the item.

For example, some states require that if you are a supplier that provides DMEPOS orthotics items under code OR01 or OR02, you must have a licensed orthotist or prosthetist serving as the person responsible for designing, fitting, and adjusting the OR01 or OR02 orthotics devices for patients. To correctly fit these kinds of orthotics, one needs a high degree of skill that comes from years of training. If the device is poorly fitted, there is the potential for patient harm.

We remind suppliers of the following:

- You must send copies of your state licenses to the NSC if you are in 1 of the states requiring a licensed orthotist or prosthetist to provide OR01 or OR02 orthotics.
- If you wish to bill Medicare for OR01 or OR02 orthotics items, you must report the correct specialty code(s) to the NSC upon initial enrollment in addition to providing licensure documentation.
- If you don't provide OR01 or OR02 orthotics at the time of initial enrollment, but later begin to, you must report the change to the NSC within 30 days of the change under [42 CFR 424.57\(c\)\(2\)](#).
- If you need to update your enrollment with the correct specialty code(s), you must submit a "Change of Information" via PECOS or the [CMS-855S](#) to the NSC, along with all applicable licenses or certifications.

The NSC is responsible for maintaining a central data repository of enrollment information on DMEPOS suppliers.

If the NSC determines you are providing products in a supply category you didn't disclose on an application, the NSC may revoke your billing privileges, regardless of DMEPOS specialty type.

## More Information

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Visit the [PECOS](#) webpage for more information on this system.

For more information, contact your [DME MAC](#).

## Document History

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Date of Change	Description
May 10, 2021	Initial article released.

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