

Dumped by the Carrier

Here's what to do when your supplier status is invalidated.

BY PAUL KESSELMAN, DPM

Over the past several months, at least two podiatrists complained on *PM News* that they're being "dumped" by the National Supplier Clearinghouse (NSC), the Medicare agency which credentials Medicare suppliers. Their stories were somewhat similar in that they never received an official notification from Medicare that they needed to submit an 855S for revalidation. Both contend that their only contact from the NSC was a letter stating that because they failed to revalidate, their supplier numbers were being invalidated. This brief article will tell the rest of their stories, including a successful resolution for at least one (the other is still pending) and how you can avoid a similar fate.

Fact 1: The NSC requires all suppliers to revalidate their status every three years.

Fact 2: The NSC sends only one USPS letter (in a yellow envelope) within 60 days of your revalidation deadline.

Fact 3: The NSC will send you this notification to only the contact address listed on your previous application.

Fact 4: If you fail to submit an application by the deadline, your supplier status will be invalidated. This information will be communicated to the DME MAC and your ability to bill DMEPOS will be terminated.

In this day and age, it seems particularly absurd for any Medicare agency to rely on one single method of contact. However, the

NSC contends that contact information (including office and email addresses) often changes. Thus, if your contact information changes prior to revalidation and your mail is no longer forwarded, that is considered to be your problem (by the NSC), and they require *you* to notify them if any such change occurs. The USPS is not exactly 100% reliable, but the NSC also contends that your physical address is the only method by which CMS has stipulated that they contact sup-

pliers with revalidation. As for some who suggest that email notification be used, that has similar problems as physical addresses, because email addresses and servers also change, and filters place some emails into spam or junk mail, etc. Thus snail mail remains the NSC's sole method of notification.

However, your office may be proactive by utilizing an interactive web search tool made available by CMS, by which you can inquire about your renewal status. This tool will work for both your local Medicare and DME provider status. Utilizing this tool should resolve the problem for most readers.

By typing <https://data.cms.gov/> revalidation into your browser, you can track the date you may be re-

quired to revalidate. Within this website, you will be asked to enter your NPI number and the name of the provider used for the submission of claims. This will show your need to renew up to six months ahead of your renewal deadline. If there is a "TBD", then no date has been set for revalidation.

Here are some useful tips for those who find themselves either very close to the deadline or have already been informed that their status has been invalidated:

**In this day and age,
it seems particularly absurd for any Medicare agency
to rely on one single method of contact.**

If you did not receive an 855S application and utilizing the above webportal you find you have a deadline you cannot meet, immediately contact the NSC (866 238 9652). Most often, they will give you one extension of at least thirty days. This should be more than enough to either reach out to a professional credentialing specialist to submit your application for you. Alternatively, you should have enough time to submit an application on your own. Beware that the applications today are quite complicated, and for many readers, using a professional who does this every day, rather than relying on staff or yourself, may be a more productive use of your time.

Should you find yourself in the

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predicament of having your supplier status invalidated, immediately contact the NSC and inform them that you never received an application. They will most likely inform you that once your *completed* application is received, your invalidation date will be set aside and your supplier number will be re-activated, retroactive to the date of termination. A completed application means that you have provided them with all the required information, including payment for your triennial enrollment.

This essentially means that you may continue to supply DME during the time between your inactivation and their receipt of your completed application. Once you receive a letter from the NSC that they have received and reinstated your supplier number (again retroactive to the original termination date), you will be able to again submit claims (with dates of service retroactive to the termination date). You might consider, however, waiting another week or two before you submit those claims. It may take a month for you to receive a retroactive notification (from the time of filing) and more than that for the NSC to complete your revalidation for the next three years.

As to when you should submit your application, you are under no obligation to submit an application prior to the 60-day window. In fact, submitting an application too

early can result in a return of your application. Once you are listed on the revalidation portal, you should begin to accumulate all the data required.

There are advantages to submitting the NSC application via paper and/or PECOS and each supplier's circumstances lend themselves to different methods. Again consulting with an enrollment specialist can be the best way to determine which method is best for your practice.

There is no “physician supplier status” exempting physicians providing DMEPOS. All suppliers are required to pay the fee for the privilege of providing DMEPOS.

If you choose to submit the application via paper, be sure to use a traceable courier with signature and delivery confirmation. If you fail to receive a confirmation of receipt of your application from the NSC within two weeks of submission, you should immediately contact the NSC at the number listed above.

At the time of this writing, both podiatrists have had their de-activation status corrected. One is awaiting the NSC's completion of his revalidation for the next three years. The other has already taken the steps noted above.

It is also important to note that your “official” revalidation is not complete until after the application is received and any outstanding issues are resolved, your payment is made (your application won't even be processed until the payment is received) and you have successfully completed a site inspection by the NSC. Once all that occurs, your revalidation letter from the NSC officially confirming your revalidation will be sent, usually within a month of the inspection.

As for the fee, there is no “physician supplier “status” exempting physicians providing DMEPOS. All suppliers are required to pay the fee for the privilege of providing DMEPOS.

To summarize, using the CMS portal <https://data.cms.gov/revalidation> will tell you when you will need to be revalidated for both the NSC and your local Medicare carrier. It is a very simple tool requiring your name and NPI number(s). It will provide you with a six month jump start on when your revalidation application will be required. **PM**



Dr. Kesselman is in private practice in NY. He is certified by the ABPS and is a founder of the Academy of Physicians in Wound Healing. He is also a member of the Medicare Provider Communications Advisory Committee for several Regional DME MACs (DMERCs). He is a noted expert on durable medical equipment (DME) for the podiatric profession, and an expert panelist for Codingline.com. He is a medical advisor and consultant to many medical manufacturers.