

2023 DME Update

Here are some answers to FAQs.

BY PAUL KESSELMAN, DPM

On a rotating basis, CMS negotiates its contracts with the Medicare Contractors via a formal bidding process. Fortunately, this does not come at the same time for each contractor, and very often the same contractor is awarded the contract for another term. Most recently, the National Supplier Clearinghouse (NSC) had their contract up for bid and CMS decided not to renew the NSC contract in its entirety. This article will explore the new contractor(s) and how this may affect your re-enrollment, initial enrollment, and your other requirements as required by the 30 Supplier Standards.

On November 7, 2022, the National Supplier Clearinghouse ceased to exist. It has been replaced by two independent carrier contractors, now referred to as National Provider Enrollment entities. These two entities are known as National Provider Enrollment (NPE) East and West. As can be deciphered by their names, the entity to which you will enroll, revalidate, or provide response to will be determined by YOUR office geographic location. As can be seen from the map (Figure 1), the Mississippi River is the dividing line. Suppliers (now referred to as providers) located east of the Mississippi River are governed by NPE East (Novitas). Providers located west of the Mississippi River are governed by NPE West (Palmetto).

Of interest here is that Novitas has a long history in adjudication of Part A and B claims and has a significant footprint on the percentage of claims and enrollment it handles for providers throughout the country.

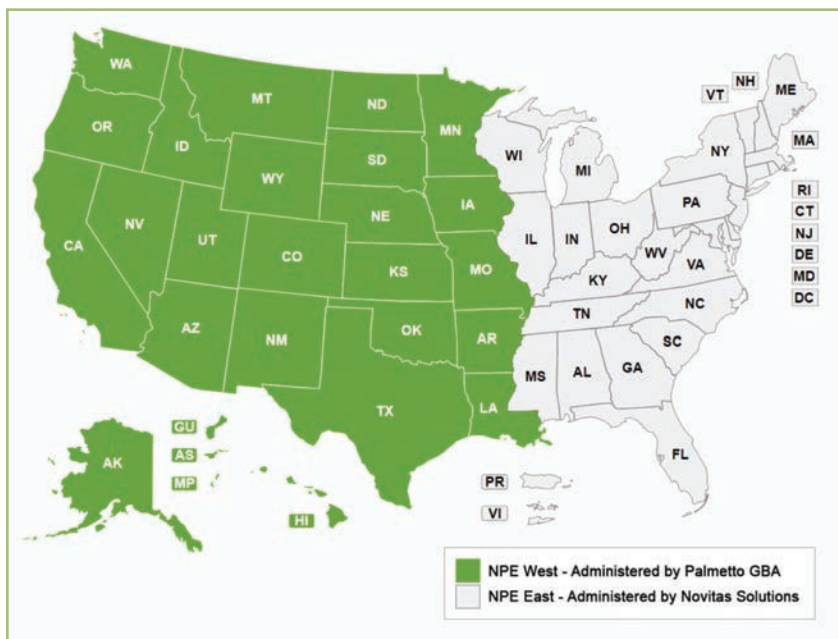


Figure 1

On November 7, 2022, the National Supplier Clearinghouse ceased to exist.

The Novitas DMEPOS help desk may be reached at: 1-866 520-5193 with a mailing address of: Novitas Solutions, Inc. PO Box 3704 Mechanicsburg, PA 17055-1863

Palmetto had been the contractor which owned the NSC contract and has a long history in enrollment and engagement with other types of provider contracts. Palmetto may be reached at: 1-866-238-9652 and at Palmetto GBA, AG-495 PO Box 100142 Columbia, SC 29202. Thus, both Novitas and Palmetto are well suited to handle this task.

Those providers who submitted

either initial or re-enrollment applications, regardless of manual 855S or via PECOS, and which were not finalized prior to November 7, 2022, have been transferred to the respective appropriate NPE carrier. As of early December 2022, there have been minimal reported hiccups with these applications.

The NSAC committee (a subcommittee of the Medicare Jurisdictional Council) has met with both the outgoing NSC administration and the current NPE East and West leadership. Future meetings with both

Continued on page 42

2023 Update (from page 41)

NPE and NPE West, both individual and joint, are planned. This is to ensure that provider concerns can be resolved without interruption of enrollment or re-enrollment applications or future ongoing business practices.

Several immediate concerns discussed with both NPE contractors include:

Question 1: *If a provider has multiple locations with one being East of the Mississippi and one West of the Mississippi, does one need to apply to each NPE or will one be sufficient?*

A: Each location will require its own PTAN, and thus each location its own application. Thus, whether via PECOS or manual 855S, each location would require a separate application and that would be sent to the appropriate NPE.

If your current enrollment was submitted and received by PECOS on or before December 31, 2022, your enrollment or re-enrollment is fixed at \$631 per location.

Question 2: *Currently, my NSC enrolment has the NSC as the Certificate Holder on my Certificate of Insurance. Am I obligated to change it now if I am not up for re-enrollment?*

A: The Supplier Standards state that if the supplier changes anything about their business practices subject to the 30 Supplier Standards, they are obligated to report those. However, in this scenario, assuming the provider did not change their policy, and did not make any changes, it is the contractor which changed. Thus, at the present time, the change of contractor does not require an immediate fix on your Certificate of Insurance (COI).

When your insurance policy renews, the NPE has advised provid-

ers to have their insurance brokers change the certificate holder to the appropriate NPE. This means that a provider with numerous offices covered under the same insurance policy may need to ask their insurance agent for multiple COIs with different certificate holders' names and addresses depending on the office location.

Each location will require its own PTAN, and thus each location its own application.

Question 3: *I have already paid by revalidation fee via PECOS to the NSC and my application has not been finalized. Will this be refunded or follow to the new NPE?*

A: As stated in the previous paragraphs, all information submitted to the NSC and not finalized by November 7, 2022 will be forwarded to

the new and appropriate NPE. This includes payment information.

Question 4: *Will the appointment of a new NPE and disengagement of the NPE change anything about site inspections?*

A: Several years ago, the NSC no longer was responsible for site inspections. That responsibility was transferred geographically similar to the current NPE. Overland Securities handles site inspections east of the Mississippi River and Deloitte handles those west of the Mississippi River (with some minor changes around the St. Louis area). With the advent to NPE vs. NSC, this has not changed. Thus, for the most part, NPE East Providers will have their site inspections conducted by Over-

land Securities, with Deloitte handling most providers' contractors with NPE West.

Question 5: *What about the application fee for 2023?*

A: If your current enrollment was submitted and received by PECOS on or before December 31, 2022, your

enrollment or re-enrollment is fixed at \$631 per location.

Medicare contractors are set for bid on a rotating basis every five years or so. This past year, CMS decided not to renew the NSC's contract and instead decided to split the contract among two contractors. Palmetto held the previous DMEPOS enrollment contract and CMS decided to divide that responsibility into two separate contractors, with Palmetto receiving half the contract and Novitas the other half. Rather than now having to deal with one enrollment contractor, many offices with states bordering the Mississippi River will now need to contend with two different enrollment contractors. Both will need to abide by the same rules and regulations as was enforced by the NSC. But with two separate administrations, by two different contractors, it will be interesting to see how strictly those rules are enforced. Providers who are located in both NPE jurisdictions should sign up for the listservs of both NPEs. **PM**

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Dr. Kesselman is board certified by ABFAS and ABMSP. He is a member of the Medicare Jurisdictional Council for the DME MACs' NSC and provider portal subcommittees. He is a noted expert on durable medical equipment (DME) and an expert for

Codingline.com and many third-party payers. Dr. Kesselman is also a medical advisor and consultant to many medical manufacturers and compliance organizations.