

June 2, 2008

Kerry Weems
Acting Administrator
Centers for Medicare and Medicaid Services (CMS)
Department of Health and Human Services
Room 445-G, Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, DC 20201

Dear Mr. Weems:

On April 2, some of the undersigned organizations sent you a letter expressing extreme concern about the requirement that "new" suppliers of durable medical equipment, prosthetics, orthotics, and supplies (DMEPOS) become accredited prior to enrolling in the Medicare program. This requirement, which was announced with little advance notice, is increasingly disrupting necessary and appropriate care for Medicare beneficiaries. We write again, with additional organizations, to re-emphasize the need to relax this accreditation requirement immediately for "new" suppliers.

We see no justification for requiring all "new" suppliers who are not involved in the DMEPOS competitive acquisition program to become accredited prior to enrolling in the Medicare program, especially since physicians, physical therapists, and occupational therapists can become subject to the "new" supplier accreditation requirement for many reasons. For some, it has been a side effect of getting their National Provider Identifiers (NPIs) to match their legacy identifiers properly. For others, the Medicare re-enrollment process has, for various reasons, led longstanding suppliers to be labeled "new" for purposes of supplier accreditation. For still many others, it is a matter of opening a new practice or a new practice location. In all of these cases, the need to become immediately accredited is not really feasible given accreditation organization workloads, making it impossible for all of these affected health professionals to provide DMEPOS products that are integral to the appropriate care of their Medicare patients. This is a grave disservice to Medicare beneficiaries.

We appreciated discussing this issue with members of your staff in April and recognize that they have been working on the matter. However, our members need immediate relief and we urge CMS to permit "new" DMEPOS suppliers to become accredited by September 30, 2009, the same deadline that applies to most existing suppliers. Please contact Rodney Peele, American Podiatric Medical Association associate director for health policy and practice, at rdpeele@apma.org or (301) 581-9230 if you have questions or concerns.

Sincerely,

American Academy of Ophthalmology
American Association of Orthopaedic Surgeons
American Medical Association
American Occupational Therapy Association
American Optometric Association
American Physical Therapy Association
American Podiatric Medical Association