

DMEPOS UPDATE



Resulting from the **CMS Final Rule issued 12/2/2025** and supporting **DMEPOS Accreditation Guidance** effective January 1, 2026.



The CMS Final Rule applies to Durable Medical Equipment, Prosthetics, Orthotics, & Supplies (DMEPOS) suppliers and pharmacies that bill using DMEPOS codes. This includes pharmacies that are accredited for Infusion Pharmacy (IRX), Infusion Pharmacy without Sterile Compounding (IRX-NO797), Specialty Pharmacy, and Community Retail.

Initial and Reaccreditation Surveys

Q: How often must my DMEPOS supplier location be resurveyed and reaccredited?

A: Under the final rule, you must be resurveyed and reaccredited at least once every 12 months (annually), rather than the previous 36-month (3-year) cycle.*

- » The annual cycle began for new suppliers accredited on or after January 1, 2026.
- » For renewing organizations with a reaccreditation survey after January 1, 2026, the term of accreditation will be one year.

Q: I am currently accredited for two more years. When does my annual reaccreditation cycle begin?

A: Your annual resurvey and reaccreditation cycle begins when your current 3-year accreditation period expires.*

Q: Can the annual surveys be conducted virtually?

A: No. CMS requires on-site surveys.

Q: Do I need to be surveyed if I add a new item type?

A: Yes. CMS requires a survey for a new product category the supplier has not previously furnished. DME companies should consider adding product codes at the same time as their annual accreditation renewal.

Q: If I already signed a contract but my survey hasn't occurred yet, do I need to sign a new contract?

A: ACHC has developed an Amendment to Agreement for Accreditation Services for our DMEPOS customers that will be sent to you. The Amendment clearly states any language in your current Agreement that is being modified to be compliant with the new Rule. A separate attachment provides payment terms.

Q: Does having pharmacy accreditation with DME product codes require all services to undergo annual surveys?

A: Pharmacy services that include DMEPOS product codes, will be separated. The pharmacy services can continue to maintain a three-year accreditation, and the DMEPOS component of the accreditation will be separated and surveyed annually.

* www.cms.gov/files/document/cy-2026-hh-pps.pdf

Q: Since the DME annual survey requirements were attached to the HH Rule, does this mean that Home Health Agencies (HHAs) also need annual surveys?

A: No. The annual survey requirement does not apply to HHAs.

Q: How will ACHC handle annual survey pricing for renewing organizations?

A: We are sensitive to the financial impact this has on our customers and are absorbing some of the financial burden. We have established a new fee schedule which is available to you through your Account Advisor (AA). Don't hesitate to contact us.

Locations

Q: Do all locations need to be surveyed?

A: All supplier locations for which accreditation is required will be surveyed. The exception is for corporate (large chain) suppliers. (Large chains are defined as 25 or more locations that are considered a practice site with a DMEPOS PTAN).

Q: Can the accreditation be effective immediately at my new location before it is surveyed?

A: No, the final rule removes the 90-day temporary accreditation allowance. Existing suppliers can no longer receive accreditation for a new location for 3 months after it becomes operational without an accreditation survey.*

Q: What must I do before opening a new DMEPOS location?

A: You must notify your AO and NPE when opening a new DMEPOS location. Your AO will conduct a survey of the new location prior to issuing an accreditation approval (unless permitted otherwise, such as statistical sampling for large chains).*

Q: My organization is relocating an existing practice location. What are my accreditation requirements?

A: You must notify your AO within 30 days of a change of location/relocation. Your AO will survey your new practice location prior to awarding accreditation (unless permitted otherwise, such as statistical sampling for large chains).*

Corporate Surveys

Q: How is CMS defining “corporate”?

A: CMS will continue to define a corporate DME supplier as 25 or more practice sites with DMEPOS PTANs.

Q: Will CMS still allow sampling for corporate suppliers?

A: Yes. CMS will allow sampling moving forward. Sampling allows large chains to have a percentage of their locations surveyed. Current methodologies will be allowed to continue, and CMS will engage with stakeholders prior to making any large shifts in sampling methodology in the future.

Q: Do we need to have a corporate office survey every year?

A: Yes, the corporate office must be surveyed annually. ACHC will provide an agenda prior to the survey so required documents are available for surveyors at the time of the survey.

Changes in Majority Ownership

Q: My organization is undergoing a change in ownership. What do I need to know about accreditation?

A: You must notify your AO and NPE within 30 days of the effective date of any change in ownership. Accreditation does not automatically transfer after a merger, acquisition, or sale. An accreditation survey is required for all changes in majority ownership.*

Q: What is considered a “change in majority ownership”?

A: As defined in 42 CFR §424.551, and for purposes of this requirement only, a change in majority ownership occurs when an individual or organization acquires more than a 50 percent direct ownership interest in a DMEPOS supplier during the 36 months following the DMEPOS supplier’s initial enrollment into the Medicare program or the 36 months following the DMEPOS supplier’s most recent change in majority ownership (including asset sale, stock transfer, merger, and consolidation). This includes an individual or organization that acquires majority ownership in a DMEPOS supplier through the cumulative effect of asset sales, stock transfers, consolidations, or mergers during the 36-month period after Medicare billing privileges are conveyed or the 36-month period following the DMEPOS supplier’s most recent change in majority ownership.*

Q: Do I need to enroll as a new supplier if my ownership changes?

A: If you are undergoing a change in majority ownership within 36 months after either your initial Medicare enrollment or your most recent change in majority ownership, you must be surveyed and accredited and enroll in the Medicare program as a new DMEPOS supplier (unless one of the exceptions in §424.551 applies). Also, if you are changing your Tax Identification Number (TIN), you must be surveyed and accredited and enroll in the Medicare program as a new DMEPOS supplier.*

* www.cms.gov/files/document/cy-2026-hh-pps.pdf

Published 01.15.2026; subject to update based on additional regulatory guidance