

PHARMACY UPDATE



Resulting from the **CMS Final Rule** issued 12/2/2025 and the **CMS DMEPOS Moratorium** issued 2/27/2026.



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

Q: If a pharmacy includes DMEPOS product codes, will all services be surveyed annually?

A: No. Pharmacy and DMEPOS services are treated separately. Pharmacy services will continue on a three-year accreditation cycle while the DMEPOS component will be surveyed annually.

This allows pharmacies to maintain stability in their core accreditation while meeting CMS requirements for DMEPOS.

Q: What will annual DMEPOS surveys look like?

A: Annual surveys will be full DMEPOS surveys focused on compliance with applicable standards.

- » Surveyors will review five Medicare patient records.
- » Records are randomly selected from submitted Medicare claims.

The scope is limited to DMEPOS services only.

- » Surveyors will evaluate equipment (e.g., infusion pumps).
- » They will not assess medication dispensing or sterile compounding activities.

Q: Has CMS changed documentation requirements?

A: No changes have been made to documentation requirements for providers.

The updates primarily affect how ACHC submits information to CMS. Your day-to-day documentation practices remain the same with exceptions in specific scenarios, such as a change of ownership (CHOW).

Q: Will there still be a Summary of Findings/Plan of Correction process?

A: Yes, with updated terminology and timelines.

- » CMS now uses the term Corrective Action Plan (CAP).
- » Post-survey documents may reference both Plan of Correction (POC) and CAP.
- » The submission timeline has been shortened from 30 days to 15 days.

Q: Will a new ACHC application be required every year?

A: No, an annual application is not required. You will only need to confirm that your organization's information in the customer portal is current. A full application is required every three years at the time of accreditation renewal.

Q: Can pharmacies choose a one-year DMEPOS accreditation and a three-year pharmacy accreditation?

A: No. Pharmacies apply for a three-year accreditation cycle. The DMEPOS component is then surveyed annually within that cycle.

Q: Which standards apply to the annual DMEPOS survey?

A: Annual surveys focus on the standards relevant to the services you provide.

To identify applicable standards:

- » Download your standards from the customer portal.
- » Include Home Medical Equipment (HME) and any additional services (e.g., CRTL, fitter, MSP), if applicable.
- » Refer to the appendix, which outlines which standards apply to each service.

Annual surveys will assess the standards associated with DMEPOS-related services, particularly in years two and three.

Q: Does the temporary nationwide moratorium on DMEPOS supplier enrollment apply to pharmacies?

A: It depends on how the pharmacy is enrolled in PECOS under the 855S.

- » Enrolled as a pharmacy provider: The moratorium does not apply.
- » Enrolled as a medical supply company (including those with a registered pharmacist): The moratorium does apply.

For pharmacies affected by the moratorium:

- » New locations cannot obtain a PTAN.
- » Changes in majority ownership cannot be processed.