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November 1, 2024

William N. Parham III
Director, Division of Information Collections and Regulatory Impacts
Office of Strategic Operations and Regulatory Affairs
Room C4-26-05
7500 Security Boulevard
Baltimore, Maryland 21244-1850.

Document Identifier: CMS–10116
OMB control number: 0938– 0971

**Re: Agency Information Collection Activities: Submission for OMB Review;
Comments on Document Identifier: CMS–10116**

Dear Director Parham,

The American Association for Homecare (AAHomecare) is the national association representing durable medical equipment, prosthetics, orthotics, and supplies (DMEPOS) suppliers, manufacturers, and other stakeholders in the homecare community. Our members are proud to be part of the continuum of care that assures beneficiaries and other patients receive cost-effective, safe, and reliable home care products and services.

AAHomecare appreciates the opportunity to provide comments on the Centers for Medicare and Medicaid Services' request to renew approval for the collection requirements associated with the final rule, CMS–3017–F (71 FR 17021). For a beneficiary to qualify for a power wheelchairs or power-operated vehicle (PMD), CMS regulations require (1) the physician or treating practitioner to have a face-to-face examination with the beneficiary, (2) the DME supplier to obtain and maintain the pertinent parts of the beneficiary's medical record within 45 days of the face-to-face examination, and (3) a written order.

Since the publication of the regulation on April 5, 2006, CMS has simplified and streamlined the DMEPOS ordering requirements to a single Standard Written Order (SWO). Prior to the adoption of the SWO, there were several different types of orders, such as, detailed written order and written order prior to delivery. The type of order required was determined by the DMEPOS item and had differing required timeframes

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and content. The SWO is applied to all DMEPOS items and reduced the order components by requiring only five elements:

- Beneficiary name or MBI (Medicare beneficiary identifier)
- Item description—can be a general description, HCPCS code, or brand/model name
- Order date
- Practitioner name or NPI
- Practitioner signature

By consolidating the previous requirements, the SWO reduced administrative burden and improved uniformity of requirements. AAHomecare supports the continued practice of utilizing the SWO, as it has greatly improved the consistency and efficiency of DMEPOS orders.

In addition, as of CY2020, CMS permanently extended the timeframe for the face-to-face examination requirement for PMDs from 45 days to six months. CMS extended the timeframe, allowing more flexibility for beneficiaries and providers on the examination and ordering times. AAHomecare supports maintaining the longer timeframe of six months as it has improved access and reduced burden for all stakeholders.

Thank you for the opportunity to submit these comments. Please contact me if you have any further questions. I can be reached at kimb@aahomecare.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Kim S. Brummett".

Kim Brummett
Senior VP, Regulatory Affairs
American Association for Homecare