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October 6, 2025

Centers for Medicare and Medicaid Services
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development
Attention: OMB Control Number: 0938-1056
Room C4-26-05
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Re: Data Collection and Submission for Open Payments (CMS-10495)

Introduction

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 feedback on the updated Medicare Enrollment Application for Durable Medical Equipment, Prosthetics, Orthotics, and Supplies (DMEPOS) suppliers. The submission of the application is a crucial step in companies providing DMEPOS services to Medicare beneficiaries and patients. Updates to the form can have significant implications for suppliers and therefore, we appreciate the opportunity to provide feedback on the draft 855s form.

Comments

Overall, AAHomecare supports the changes proposed in the draft 855S form. We are especially pleased to see the addition in **SECTION 1: BASIC INFORMATION (Continued), A. REASON FOR SUBMITTING THIS APPLICATION**, where suppliers enrolling in Medicare solely to participate in another program (with no plans to bill Medicare) may now indicate this. We believe this update will significantly reduce burden for suppliers who have had to bill Medicare at least once every six months to keep their PTAN active.¹

The majority of our concerns with the draft 855S are procedural rather than related to the form's content. For example, when a new product category is added to **SECTION 2: IDENTIFYING INFORMATION (Continued), 4. Products and Services Furnished by this Supplier**, when will suppliers already furnishing that product be expected to submit an updated 855S form? Is there a required timeframe for doing so, or can it be addressed during the next revalidation? Clarification

¹ 42 C.F.R. § 424.540(a)(1)

on this point to the supplier community is necessary to ensure their PTANs are not at risk for deactivation when they bill HCPCS codes in a newly added product category.

Additionally, we note the new column allowing suppliers to indicate whether a product or service is provided by mail order. If a supplier provides some or all services by mail order, will they be required to update their form to reflect this? If so, what is the expected timeframe for submission? As you know there are thousands of active PTANs in the DMEPOS space, if suppliers are required to update their applications for each PTAN, it would significantly add to the workload for suppliers and in turn add to the workload for the enrollment contractors. Suppliers are required per the supplier standards to ensure their applications are accurate within 30 days.²

When a new 855S form is released for stakeholder feedback, we respectfully request that CMS clearly communicate the draft's availability and the opportunity to comment. Currently, the form is published in the Federal Register under the Paperwork Reduction Act title, which makes it difficult for stakeholders to locate. The title does not make the form updates readily apparent, and most suppliers are not regular readers of the Federal Register. As a result, many are unaware of the changes.

To improve transparency and ensure broader awareness, we recommend that CMS share these updates more widely, such as through a DMEMAC listserv announcement or an MLN Matters article so suppliers are informed of both the changes and the opportunity to provide feedback.

Conclusion

Thank you for the opportunity to share the DMEPOS industry's feedback of the new Medicare Enrollment Application for DMEPOS suppliers form. Please contact me if you have any further questions. I can be reached at kimb@aahomecare.org.

Sincerely,



Kim Brummett
Senior VP, Regulatory Affairs
American Association for Homecare

² CMS, *Medicare Enrollment Application (CMS-855S, Durable Medical Equipment, Prosthetics, Orthotics, and Supplies)* (Dec. 2023)