



COMPETITIVE BIDDING PROGRAM

FAQ Resource

Product Categories

Q: Which product categories will be included in Competitive Bidding (CB)?

A: Confirmed categories include:

- Class II Continuous Glucose Monitors (CGMs) & Insulin Pumps
- Urological Supplies
- Ostomy Supplies
- Hydrophilic Urinary Catheters
- Off-the-shelf Back Braces
- Off-the-shelf Knee Braces

Competitive Bidding Areas (CBAs)

Q: Will the same 100 Metropolitan Statistical Areas (MSAs) be bid again?

A: CMS has not clarified this yet. Updates will be shared as soon as available.

Accreditation

Q: When will the transition from three-year accreditation to annual accreditation be implemented?

A: The Final Rule goes into effect January 1, 2026. CMS and the accreditation organizations are meeting on the requirements. Further instructions are forthcoming, so be sure to stay in touch with your accreditation organization.

Q: Will annual accreditation apply only to Competitive Bidding winners?

A: No, this applies to all DME suppliers.

Q: If recently accredited for three years, how does this work with the new annual survey?

A: CMS will provide details on this process. Stay in touch with your accreditation organization.

Q: Will accreditation costs triple with annual surveys?

A: Cost structure is unknown at this time.

Q: What are the timeline implications for Competitive Bidding Implementation Contractor recompetes?

A: The next round is anticipated to begin no later than January 1, 2028. Suppliers will need a credit report and bid surety bond. Suppliers should start preparing now. CMS will announce details in 2026.

Billing/Coding/Fee Schedule

Q: What happens to fee schedules for rural, non-CBA, and non-rural areas?

A: We are currently seeking clarification from CMS regarding conflicting information in the Final Rule. Once we receive confirmation, we will promptly notify VGM members.

Q: Is this new? When a physician prescribes a specific brand or delivery mode to avoid adverse outcomes, suppliers must provide it or find alternatives.

A: This is not new. Suppliers must work with physicians and patients to meet medical needs being prescribed.

Bidding Process/Obtaining Contracts

Q: Where can we get credit reports?

A: CMS will provide details in the Request for Bids Instructions before the bid window opens.

Q: Are they looking at personal credit score and/or DUNS #?

A: Entities unable to generate a business credit score must submit a business report showing insufficient data plus a personal credit report for the Authorized or Delegated Official listed in Provider Enrollment Chain and Ownership System (PECOS).

Q: What qualifies as a small business?

A: Gross revenue of \$3.5 million or less annually, including Medicare and non-Medicare revenue.

Q: Which year's revenue applies?

A: Likely 2025 financials; however, CMS will confirm.

Q: What does the 90% affirmation threshold mean?

A: The affirmation threshold relates to the Prior Authorization Exemption. At least a 90% affirmation rate is required to qualify for the exemption program.

Q: Is it 30% of awarded contracts for small suppliers?

A: Yes. If less than 30% of winners are small suppliers, additional contracts may be offered to meet the target.

Q: Are contracts awarded to a company's TIN or location PTAN?

A: Per location.

Q: Can you subcontract?

A: Yes, subcontracting is allowed.

Q: Explain exemptions like Tribal and PHE.

A: Indian Health Service and tribally operated Medicare providers do not need to bid for CB program items for AI/AN beneficiaries in CBAs.

Q: Does drop shipping need to be reported to enrollment?

A: Yes. If shipping to certain states, this needs to be reported in PECOS/855S. In addition, state licensing requirements must be met.

Q: Have there been any changes to the existing patient transition policy?

A: CMS has not addressed this yet.



Resources

Q: What resources will VGM provide?

A: VGM will compile education, bid calculators, CBA maps, and updated licensure info once CMS releases the details.

You can find this information and more [here](#).