PROVIDER ENROLLMENT 101
MARCH 2019

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Overview

Morning Session
- Introduction to Medicare
- Provider Enrollment Overview
- Submission
- Intake
- Processing, Screening and Verification
- Finalization and Claims

Afternoon Session
- Provider Enrollment Policy
Poll Question 1
Poll
Question 2
Introduction to Medicare
What is Medicare?

Medicare is a federal health insurance program for:

- People 65 and older,
- Certain younger people with disabilities, and
- People of any age with End-Stage Renal Disease

Different parts of Medicare help cover specific services (A, B, C and D)
Medicare Part A (Hospital Insurance)

**Part A** covers inpatient hospital stays, care in a skilled nursing facility, hospice care, and some home health care

- Hospital
- Federally Qualified Health Center
- Community Mental Health Center
- Skilled Nursing Facility
- Home Health Agency
Medicare Part B (Medical Insurance)

Part B covers certain doctors' services, outpatient care, medical supplies, and preventive services

- Physician/Non-Physician Practitioner Services
- Clinic/Group Practices
- Independent Diagnostics Testing Facilities (IDTF)
- Durable Medical Equipment, Prosthetics, Orthotics, and Supplies (DMEPOS) suppliers
- Medicare Diabetes Prevention Program (MDPP) suppliers
Part C provides Part A and Part B benefits offered by a private company that contracts with Medicare

- Health Maintenance Organizations
- Preferred Provider Organizations
- Private Fee-for-Service Plans
- Special Needs Plans
- Medicare Medical Savings Account Plans
Medicare Part D (Prescription Drug Coverage)

**Part D** offers coverage for prescription drugs

- Original Medicare
- Some Medicare Cost Plans
- Some Medicare Private Fee-for-Service Plans
- Medicare Medical Savings Account Plans
Poll
Question 3
What is a Medicare Administrative Contractor (MAC)?

A private health care insurer that has been awarded a geographic jurisdiction to:

- Enroll providers in the Medicare program
- Process Medicare claims (Part A/B and DME)
- Respond to provider inquiries
- Educate providers about Medicare billing requirements
A / B MACs
What is the National Supplier Clearinghouse (NSC)?

- National contractor responsible for enrolling all DME suppliers
- Ensures that DME suppliers meet and maintain all Federal and State requirements to bill the Medicare program
- Claims are processed by 4 DME MACs
DME MACs
Question & Answer Session
Provider Enrollment Overview
Establishes enrollment requirements, conditions for participation and payments

- The Social Security Act (1861)
- Federal regulations (42 CFR 424)
- Program Integrity Manual 100-08, Chapter 15
How Enrolling Works

1. **SUBMISSION**
   - Medicare Providers & Suppliers w/NPI
   - 855 Form 60 days*
   - Online 45 days

2. **INTAKE**
   - MAC Mail Room
   - Manual Data Entry
   - Direct Input
   - Development Letter

3. **PROCESSING, SCREENING, AND VERIFICATION**
   - PECOS
   - Pre-screening
     - Signed and Dated
     - App Fee (or Waiver)
     - Supporting Docs
     - All Data Elements
   - Verification
     - Name / LBN
     - SSN / DOB
     - NPPES
     - Address
     - License
     - Adverse Actions
   - Risk Category
     - Fingerprints
     - Site Visits

4. **FINALIZATION AND CLAIMS UPDATE**
   - MAC Recommendation to State/RO
     - Certified providers/suppliers
     - MAC recommends to RO
     - RO performs in 3-9 months
   - Update Claim System
     - MAC Updates Claim System (1-2 days)
     - Provider not approved until claims updated

* If the app is complete, and no site visit
Submission

Medicare Providers & Suppliers w/NPI

1. SUBMISSION

855 Form
60 days*

Online
45 days

* If the app is complete, and no site visit
• **Type 1**
  Individual healthcare providers (i.e., physicians, dentists, chiropractors, physical therapists)

• **Type 2**
  Organizational healthcare providers (i.e., hospitals, home health agencies, clinics, labs, group practices, suppliers of durable medical equipment)

**Providers must obtain an NPI prior to enrolling in the Medicare Program.**

Healthcare providers can apply for NPIs in one of three ways:

• Online via National Plan & Provider Enumeration System (NPPES)
• Paper NPI Application/Update Form (CMS-10114)
• Electronic File Interchange (EFI) whereby an approved EFI Organization can submit the healthcare provider’s application on their behalf (i.e., through a bulk enumeration process).

NPPES Registry (for online queries):
https://npiregistry.cms.hhs.gov/NPPESRegistry/NPIRegistryHome.do
Taxonomy Codes vs. Specialty Types

**Taxonomy Codes**
- Providers select a taxonomy code when applying for an NPI
- Uniquely identifies providers in order to assign them NPIs, not to ensure that they are credentialed or qualified to render health care
- May or may not be the same category used by Medicare for enrollment purposes

**Specialty Types**
- Self-designated on the CMS-855 application
- Describes the specific type of medical practice or services provided
- Used by CMS for enrollment and claims processing
Taxonomy / Specialty Crosswalk

- CMS crosswalks the types of providers/suppliers who are eligible to enroll in Medicare with the appropriate taxonomy codes.
- Can be accessed at [data.cms.gov/Medicare-Enrollment/CROSSWALK-MEDICARE-PROVIDER-SUPPLIER-to-HEALTHCARE/j75i-rw8y](data.cms.gov/Medicare-Enrollment/CROSSWALK-MEDICARE-PROVIDER-SUPPLIER-to-HEALTHCARE/j75i-rw8y)
- Updated on a quarterly basis
CMS-855 Enrollment Applications

- **CMS-855A** Institutional Providers (Part A)
- **CMS-855B** Clinics/Group Practices and Certain Other Suppliers *(Part B, non-DME Suppliers)*
- **CMS-855I** Physicians and Non-Physician Practitioners *(Part B, non-DME Individuals)*
- **CMS-855R** Reassignment of Medicare Benefits *(Supplemental to CMS-855I form)*
- **CMS-855S** Suppliers of Durable Medical Equipment, Prosthetics, Orthotics, and Supplies (DMEPOS) *(Part B, DME Suppliers)*
- **CMS-855O** Eligible Ordering, Referring and Prescribing Physicians and Non-Physician Practitioners *(Part B, Part-D and non-DME Individuals)*
- **CMS-20134** Medicare Diabetes Prevention Program (MDPP) Suppliers *(Part B, non-DME Suppliers)*
# Authorized and Delegated Officials

Authorized and Delegated Officials are responsible for enrolling, making changes, and ensuring compliance with enrollment requirements. Here are the roles and responsibilities of each:

### Authorized Official (AO)
- Enroll, make changes, and ensure compliance with enrollment requirements
- **CEO, CFO, partner, chairman, owner, or equivalent appointed by the org**
- **May sign all applications (must sign initial application)**
- Approves DOs

### Delegated Official (DO)
- Appointed by the AO with authority to report changes to enrollment information
- **Ownership, control, or W-2 managing employee**
- **Multiple DOs permitted**
- **May sign changes, updates & revalidations (cannot sign initial application)**
Who Can Sign the Enrollment Application?

Initial: 
- Authorized Official (AO)

Changes & Revals: 
- Authorized Official (AO)
- Delegated Official (DO)

All: 
- Individual Provider (IP)

Adding: 
- Individual Provider (IP)
- Delegated Official (DO)
- Authorized Official (AO)

Changing / Terminating: 
- Individual Provider (IP)
- Delegated Official (DO)
- Authorized Official (AO)
Application Fees

- Supports provider enrollment and screening activities
- Required for institutional providers when initially enrolling, revalidating or adding a practice location: Home Health Agencies, DME supplier, Hospital, IDTF
- Application fee varies from year-to-year
- Must be paid electronically via PECOS
- Credit or debit card (no checks permitted)
- MACs will develop for missing application fees and reject the application if not submitted within 30 days

Application fee for 2019 is $586

Refund Request

A refund may be issued if...

1. A hardship exception request is approved
2. The application was rejected prior to the MAC’s initiation of the screening process
3. The application denied due to temporary moratorium
4. Fee not required for the transaction in question or not part of an application submission

For information on which actions trigger the application fee requirement by provider/supplier type refer to the Application Fee Matrix on CMS.gov.

Pay the application fee at https://pecos.cms.hhs.gov/pecos/feePaymentWelcome.do
Poll Question 4
All providers must receive Medicare payments via EFT

Must include a copy of a voided check or bank letter verifying account information

Providers who reassign all of their benefits to a group are *not* required to submit an EFT agreement
# Participation Agreement

<table>
<thead>
<tr>
<th>Participation</th>
<th>Nonparticipation</th>
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</thead>
<tbody>
<tr>
<td>Medicare reimbursement is 5 percent higher than nonparticipating physicians</td>
<td>Medicare reimbursement is 5 percent lower than participating physicians</td>
</tr>
<tr>
<td>and other suppliers</td>
<td></td>
</tr>
<tr>
<td>Medicare issues payments directly to you because the claims are always assigned</td>
<td>You cannot charge the beneficiary more than the limiting charge, 115 percent</td>
</tr>
<tr>
<td></td>
<td>of the Medicare Physician Fee Schedule amount</td>
</tr>
<tr>
<td></td>
<td>You may accept assignment on a case-by-case basis</td>
</tr>
</tbody>
</table>
CMS-855
Submission Reasons

- New Enrollee (Initial)
- Change of Information
- Revalidation
- Reactivation
- Voluntary Withdrawal
Welcome to Medicare!

You are submitting an application to initially enroll in the Medicare program or to initially enroll in a new MAC jurisdiction

Must submit a complete application
Poll
Question 5
Question & Answer Session
Intake

2. INTAKE

- MAC Mail Room
- Manual Data Entry

Direct Input
Receipt Date Determination

Receipt date is important in determining your effective date

**Paper Applications**
- Based on the date the MAC received the package in the mail
- MACs will no longer accept handwritten applications (*late 2019*)

**Web Applications** (*October 2018*)
- Based on the date the MAC received the web submission in PECOS
- Must be e-signed or signature uploaded
Impacts to Receipt Date

**Fingerprints**
- The date fingerprint results are received

**Hardship Waiver Approval**
- The date CMS notifies the MAC that the hardship waiver is approved
Poll Question 6
Effective date is the later of:
- Application Receipt Date
- Date of first services at a new location (up to 30 days prior to application receipt)

** Option A: Early Submission **
Physicians / Groups can apply 60 days prior **

<table>
<thead>
<tr>
<th></th>
<th>MAC receives app</th>
<th>MAC approves</th>
<th>Provider performs service</th>
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</thead>
<tbody>
<tr>
<td>APR 1</td>
<td>MAY 15 (w/ effective June 1)</td>
<td>JUNE 1</td>
<td></td>
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</tbody>
</table>

** Option B: Late Submission **
Physicians / Groups effective date up to 30 days prior to submission date ***

<table>
<thead>
<tr>
<th></th>
<th>MAC receives app</th>
<th>MAC approves</th>
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</thead>
<tbody>
<tr>
<td>JUNE 1</td>
<td>JULY 1 (w/ effective June 1)</td>
<td>SEPT 1</td>
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</table>

** Must be in compliance at requested effective date (operational, licensed)**
## Medicare Effective Dates | Part B

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Effective Date</th>
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<tbody>
<tr>
<td>Application receipt date of 6/10/19 with app requested date of 7/01/19</td>
<td>7/01/19 (no retro, based on requested effective date on application)</td>
</tr>
<tr>
<td>Application receipt date of 6/10/19 with app requested date of 6/01/19 and all requirements met</td>
<td>6/01/19 (based on requirements met date)</td>
</tr>
<tr>
<td>Application receipt date of 6/10/19 with app requested date of 3/01/19</td>
<td>5/11/19 (30-day retro)</td>
</tr>
<tr>
<td>Application receipt date of 6/10/19 with app requested date of 6/01/19, license effective date 6/28/19</td>
<td>6/28/19 (based on license effective date)</td>
</tr>
</tbody>
</table>
Medicare Effective Dates | Part B

Independent Diagnostic Testing Facility (IDTF)

- The later of: (1) the receipt date of the application or (2) the date all Medicare requirements were met

Ordering and Referring Only Providers (CMS-855O)

- Receipt date of the application
Hospitals / HHAs / SNFs can apply up to 180 days prior **

<table>
<thead>
<tr>
<th>Provider seeking effective date</th>
<th>SEPT 1</th>
</tr>
</thead>
</table>

** Must be in compliance at requested effective date (operational, licensed)
Question & Answer Session
Processing, Screening and Verification

PECOS

PRE-SCREENING
- Signed and Dated
- App Fee (or Waiver)
- Supporting Docs
- All Data Elements

VERIFICATION
- Name / LBN
- SSN / DOB
- NPPES
- Address

RISK CATEGORY
- License
- Adverse Actions
- Fingerprints
- Site Visits

Development Letter

Medicare Providers & Suppliers w/NPI
What Causes Delays?

- **Missing Documents**
  - IRS documents, CMS 588 EFT, voided check, bank letter, education documentation, par agreement, cert term page, org charts

- **Missing Fields** (missing signature/date)

- **Wrong Signature** (paper)

- **Incorrect Information**

- **Missing Application Fee**

30-35% delayed

need at least 1 round of corrections

How the MAC develops for missing information

<table>
<thead>
<tr>
<th>Contacts the...</th>
<th>By...</th>
<th>No response?</th>
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</thead>
<tbody>
<tr>
<td>1. Contact person (sec 13)</td>
<td>email, fax, phone, letter</td>
<td>delays</td>
</tr>
<tr>
<td>2. Individual provider (sec 2)</td>
<td></td>
<td>rejections</td>
</tr>
<tr>
<td>3. Authorized or Delegated Official (sec 15/16)</td>
<td></td>
<td>later effective date</td>
</tr>
</tbody>
</table>

30 days to respond
Poll Question 7
MAC Notification Letters

Who is listed on MAC notification letters?

APPLICATION RECEIPT

PROCESSING & DEVELOPMENT

AFTER FINALIZATION

MAC analyst is the point of contact listed on the letter

MAC call center is the point of contact listed on the letter
How Addresses are Used

Correspondence
Used to contact the provider directly
- Approval letters
- Revalidation notices
- Revocation letters

Medical Record Correspondence
Used to request documentation
- Medical records

Practice Location
Where you render services to beneficiaries
- Revalidation notices
- Site visit
How Addresses are Used

Primary Practice Location (855R)
Where you render services most of the time

• Physician Compare

Special Payment
Where all other payment information is sent

• Revalidation notices
• Remittance notices
• Paper checks

Contact Person
Person to contact regarding your application

• Development requests
• Approval letters
Any contact listed on an enrollment record may request a copy of approval and revalidation letters.

MAC will send by...

- email
- fax
- mail

(excludes certification letters or Tie In notices issued by Regional Office)

How to end date a contact person?

Requests may be submitted by...

1. Current Contact person (sec 13)
2. Individual provider (sec 2)
3. Authorized or Delegated Official (sec 15/16)

By...

1. email
2. fax
3. letter

Addition of contact persons must still be reported on appropriate CMS-855
# Certification Statement Requirements

## PAPER

<table>
<thead>
<tr>
<th>CERT</th>
<th>INVALID CERT</th>
<th>MAC DEVELOPS</th>
</tr>
</thead>
<tbody>
<tr>
<td>CERT</td>
<td>MISSING CERT</td>
<td>MAC DEVELOPS</td>
</tr>
</tbody>
</table>

### EXAMPLES OF INVALID CERT:
- Stamped Signatures
- Unsigned
- Undated
- Wrong Person Signed

### BEST WAY TO SUBMIT YOUR CERT STATEMENT:

1. CERT
   - OR
   - 855
     - SEND WITH CMS 855
     - IF YOU MUST, MAC WILL ACCEPT: FAX, E-MAIL, OR MAIL, BUT WILL LEAD TO DELAYS

## WEB

<table>
<thead>
<tr>
<th>PECOS</th>
<th>INVALID CERT</th>
<th>MAC DEVELOPS</th>
</tr>
</thead>
<tbody>
<tr>
<td>PECOS</td>
<td>MISSING CERT</td>
<td>MAC DEVELOPS</td>
</tr>
</tbody>
</table>

### BEST WAY TO SUBMIT YOUR CERT STATEMENT:

1. PECOS
   - OR
   - SIGNATURE UPLOAD
   - E-SIGN
Screening Levels

Screening level may be elevated to “high” if:

- Excluded from Medicare/other Federal Health Care program
- Terminated from Medicaid
- Applied for Medicare within 6 months after temporary moratorium
- Within the last 10 years, you had:
  - Medicare payment suspension
  - Medicare billing privileges revoked
  - Final adverse action(s)
Site Visits | National Site Visit Contractor (NSVC)

- All enrollment site visits conducted by the NSVC (except Durable Medical Equipment (DME) suppliers)
- Required for moderate/high risk providers
  - initial enrollment, revalidation, adding a new location
- CMS has the authority to perform site visits on all providers
- Verifies practice location information to determine compliance with enrollment requirements
- Separate from state site visits for certified providers

What to expect during a site visit?

1. An external or internal review, by an inspector, with limited disruption to your business
2. Photographs of the business
3. Inspector will possess a photo ID and a letter of authorization issued and signed by CMS
   - To verify that an inspector is credentialed to perform a site visit contact MSM Security Service, at 1-855-220-1071.

Refer to SE1520 on CMS.gov for more information
All DME supplier enrollment site visits conducted by the NSC
Required for initial enrollments and revalidation
Verifies compliance with supplier standards:
- Hours of operation
- Licenses/certifications
- Patient records
- Proof of business records (rental agreements)
- Inventory

What to expect during a site visit?

1. An internal review by an inspector
2. Photographs of the business
3. Staff interviews

Inspector will possess:
- Photo identification
- Letter stating reason for the visit signed by the NSC manager
- Site visit acknowledgment form (signed by the supplier attesting the visit was completed)
Fingerprinting

CMSfingerprinting.com

Applies to:
- New HHAs
- New DME suppliers
- New MDPP suppliers
- High risk providers/suppliers

Excludes:
- Managing Employees
- Officers
- Directors

5%\(^{(+)\) Ownership/Partners in a high risk provider/supplier

- Letter will be sent giving 30 days to get fingerprinted
- Medicare phased rollout

If the provider/supplier:
- Has a felony conviction
- Refuses fingerprinting

Then CMS may deny the application, or revoke their billing privileges

If the initial fingerprints are unreadable a 2\(^{nd}\) set of fingerprints will be requested

CMS | National Provider Enrollment Conference | March 2019
Poll
Question 8
Question & Answer Session
PROVIDER ENROLLMENT 101

Joseph Schultz, CMS
Team Lead, Division of Enrollment Operations

William Price, National Government Services
Provider Enrollment Process Expert
Finalization and Claims

FINALIZATION AND CLAIMS UPDATE

Update Claim System
• MAC Updates Claim System (1-2 days)
• Provider not approved until claims updated

MAC Recommendation to State/RO
• Certified providers/suppliers
• MAC recommends to RO
• RO performs in 3-9 months
Approved

- The enrolling provider / supplier has been determined to be eligible under Medicare rules and regulations to be granted Medicare billing privileges

- Provider is not approved until claims system is updated (within 1 – 2 days)

- Approval letter is sent to the contact person. If no contact person is listed the letter is sent to the provider at their correspondence address
Poll Question 9
What is a PTAN?

- A Medicare-only number issued to providers upon enrollment to Medicare
- Used to authenticate the provider when using the Interactive Voice Response (IVR) phone system, internet portal or on-line application status
- The PTAN's use should generally be limited to the provider’s contact with their MAC
- The NPI must be used to bill the Medicare program
Physician / Non-Physician PTANs

- Individuals are assigned PTANs based on their private practice and group affiliations (i.e. sole proprietor, reassignment of benefits)
- Individuals who reassign their benefits receive a member PTAN for each group PTAN they reassign to
- A sole owner would have a Group PTAN assigned for the business and a member PTAN for themselves
Group / Supplier PTANs

- PTANs are assigned per EIN, per State
- An existing provider would require a new PTAN if:
  - Adding a new location in a different payment locality in the same State
  - Enrolling a different provider type
  - Exception: Hospitals that receive a PTAN per department
What is a CCN?

- A CCN is a CMS Certification Number issued to Part A/B certified providers
- Used for verifying Medicare certification, assessment-related activities and communications
- The CMS RO assigns the CCN
  - 6 or 10 digits
  - The first 2 digits identify the state in which the provider is located
  - The last 4 digits identify the type of facility
Poll
Question 10
Understanding the TIN / NPI / PTAN Relationship

TIN to NPI to PTAN – Part A & B (non-DME)

- Organizations can have multiple enrollments per state
- Organizations can have multiple NPIs
- Individuals can only have one NPI
Understanding the TIN / NPI / PTAN Relationship

TIN to NPI to PTAN – Part B (DME)

- Organizations can have multiple enrollments per state
- DME suppliers can only have one location per enrollment
- A separate NPI is required per enrollment
Returns

- Unsolicited revalidation application
- Sent to incorrect contractor
- Submitted more than 60 days prior to the effective date
  - Part A certified providers, Ambulatory Surgical Centers (ASCs) and Portable X-ray Suppliers (PXRS) applications submitted more than 180 days prior to the effective date
- Submitted an application prior to the expiration of a re-enrollment bar
- Submitted an application prior to the expiration of the appeal window for a previously denied application
- Entire fields or sections hand-written on the application (late 2019)
How to Avoid a Return

- If submitting via paper be sure to send to the correct MAC
- Don’t submit applications more than 60 or 180 days in advance of the effective date
- Don’t submit a revalidation more than 7 months in advance of your revalidation due date
- Don’t submit the application multiple times
- Use the fillable CMS-855 form option
Rejections

- Failure to provide complete information within 30 days of the MAC’s request
  - Missing information/documentation
  - Unsigned, undated certification statement
  - Old version of the CMS-855 application
  - Incorrect application submitted
  - Failure to submit application fee
  - Failure to submit all required forms (e.g. CMS-855Rs for group enrollments)
How to Avoid Rejections

- Don’t delay in responding to the request for information from your MAC
- Contact your MAC if you aren’t sure what you need to do to return accurate corrections
Denied

- The enrolling provider is ineligible to receive Medicare billing privileges
- Denial letter will include appeal rights
- A new enrollment application cannot be submitted until:
  - Appeal rights have lapsed, or
  - Notification received that the determination was upheld
Question & Answer Session
Other Submission Types
You are submitting an enrollment application to notify Medicare of a change(s) to your enrollment information

- CHANGE OF PRACTICE LOCATION
- CHANGE OF CORRESPONDENCE ADDRESS
- CHANGE OF OWNERSHIP
Changes of Information

- **Within 30 days**
  - Change of ownership or control, including changes in authorized or delegated official(s)
  - Adverse Legal Action (e.g., suspension or revocation of any state or Federal license)
  - Change in practice location (includes any new reassignments)

- **Within 90 days**
  - All other changes to enrollment

*Note: Timeframes may vary by provider type. Refer to SE1617 on CMS.gov for more information*
When to Select Change / Add / Delete

- **Replace existing information with new information** (ex. practice location, ownership)
- **Update existing information** (ex. change in suite #, telephone #)
- **App fee is not required**

- **Add additional enrollment information** to existing information (practice locations)
- **App fee is required**

- **Remove existing enrollment information**
- **App fee is not required**
- Deleting a practice location in PECOS removes the special payment address and requires re-entry

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1. Applicable CMS-855 sections (change/add/delete options)
2. Location information (855A/855B/855I/855S)
3. Ownership/Managing Control (855A/855B/855I/855S)
4. Billing Agency (855A/855B/855I/855S)
5. AO/DO (855A/855B/855S)
6. Attachments 1&2 (855B)

*For information on which actions trigger the application fee requirement by provider/supplier type refer to the Application Fee Matrix on CMS.gov.*

*Refer to SE1617 for reporting requirements*
Revalidation

- Verify the accuracy of your enrollment information that exists on file with Medicare
- DME suppliers revalidate every 3 years and all other providers/suppliers every 5 years
Reactivation

- You are returning to Medicare after a deactivation
- Must submit a complete CMS-855 to reactivate
- Effective date is based on the receipt date of the application
- 30 day retrospective billing permitted
- You will be issued a new Provider Transaction Access Number (PTAN)
  - Except for deactivations due to non-response to revalidation
Voluntary Withdrawal

- You will no longer be rendering services to Medicare patients
- You are planning to cease (or have ceased) operations
- You are relocating to another state and no longer intend to practice in the current state
Physicians/practitioners who do not wish to enroll in the Medicare program may “opt-out”

What this means:

- The physician/practitioner nor the beneficiary submits a bill and is reimbursed by Medicare for services rendered (beneficiary pays out-of-pocket)
- A private contract is signed between the physician/practitioner and the beneficiary
- The physician/practitioner submits an affidavit to Medicare to opt-out of the program
Filing an Opt-Out Affidavit

- A standard CMS form is not available
- Some MACs have a form available on their website
- Must be filed with all MACs who have jurisdiction over the claims the physician/practitioner would have otherwise filed with Medicare
Impacts of Opting-Out

- May not receive direct or indirect Medicare payment for services furnished to Medicare beneficiaries
  - Traditional Medicare fee-for-service
  - Under a Medicare Advantage plan
- Cannot terminate early unless opting out for the first time and within 90 days after the effective date of the opt-out period
  - Locked in for 2 years if you miss the 90 day window
- May order or certify items and services or prescribe Part D drugs for Medicare beneficiaries
  - NPI
  - Date of Birth
  - Social Security Number
  - Confirmation if an Office of Inspector General (OIG) exclusion exists
Provider Enrollment Policy
Poll

Question 11
Physician Assistant

**CAN**
- Enroll in Medicare for services provided
- Establish an employer relationship using 855I *(section 2E)*
- Terminate an employer relationship using Section 2F of 855I (PA) or Section 2G of 855B (Org)

**CANNOT**
- Individually enroll and receive direct payment *(Payments made only to PA’s employer)*
- Organize/incorporate and bill for services directly
- Reassign benefits

- Employer can be an Individual or Organization
- MAC affiliates PA to employer’s TIN and will develop for which employer PTANs to link PA
- Structure PA employer relationships to link to an enrollment vs employer’s TIN *(future)*
Physical Therapist

- Required to undergo a site visit unless PT performs services in patient’s homes, nursing homes, etc.
- Must maintain space used exclusively for your practice
- Site visit will be performed at the group’s location if you reassign all benefits
Nurse Practitioner

Enrolling for the first time?

 ✓ Must be certified by a recognized national certifying body

 ✓ Must possess a master’s degree in nursing or Doctor of Nursing Practice (DNP) doctoral degree
Reassigning Benefits

Individual provider reassigns their right to bill Medicare and receive payments for some or all of their services.

A CMS-855R is required for each organization the provider reassigns benefits.

An Authorized or Delegated Official of the organization must sign the CMS-855R.

Termination of the reassignment can be done by the practitioner or the employer.
Poll
Question 12
Interns and Residents

- Interns are NOT permitted to enroll in Medicare
- Residents are permitted to enroll in Medicare
  - Complete the CMS-855I or CMS-855O
  - Section 2C of the CMS-855I collects information on your residency program
  - Cannot bill for services provided as part of your residency program
  - Must be licensed, if applicable
  - Unlicensed residents enrolling via the CMS-855O must provide: (1) signed contract or (2) letter on institution letterhead
Ordering and Certifying

**CMS-6010**

since JAN 2014

Anyone who orders or refers services:

enroll in Medicare

or opt-out through an affidavit

State-licensed residents may enroll to order or refer using the CMS-855O, and may be listed on claims.

Claims for covered items and services from un-licensed interns and residents may still specify the name and NPI of the teaching physician.

**Reduces Fraud**

**Claims affected:**

See article [SE1305](#) for all edits

- Clinical laboratories: ordered tests
- Imaging centers: ordered images
- DMEPOS: ordered equipment, supplies
- Home Health Agencies
Converting CMS-855O to CMS-855I enrollment via PECOS

- Convert from an ordering and certifying only provider to a billing provider and vice versa
- No break in billing
- The effective date of the withdrawn 855O is one day prior to the effective date of the 855I

Conversion Steps:
- Follow current process for creating a new application
- PECOS displays existing approved enrollment and uses it to pre-populate the new application
- Provider must confirm the withdrawal of the existing 855O enrollment
Ordering and Certifying

- CMS-855O is a national enrollment

- Providers who relocate to another state are not required to dis-enroll in the current state and re-enroll in the new state

- The MAC that maintains the CMS-855O enrollment in PECOS will process the change of information, even if the provider is relocating to a state outside of their jurisdiction

- The MAC will update the provider’s record with any new licenses and/or certifications obtained as a result of the provider’s relocation
Easy Enrollment

- Log into PECOS
- Access the easy enroll interface
- Complete the required workflow changes
855O Easy Enrollment - PECOS PI

 PROVIDERS AND SUPPLIERS THAT ACCESS THE 855O FORM IN PECOS WILL BE NAVIGATED TO THE ENROLLMENT SUMMARY OF THE EASY ENROLLMENT.

 HERE, ALL REQUIRED INFORMATION WILL BE AVAILABLE ON ONE PAGE FOR EASE OF NAVIGATION AND PROCESSING, STREAMLINING THE EXISTING 855O FORM.
Users will be able to upload supporting documentation for their CMS-855O easy enroll application.

Enter license information to route application to the appropriate contractor.
Part C & D Preclusion List

CMS-4182F starts JAN 2019

Replaces the Medicare Advantage (MA) and Prescriber enrollment requirements and creates a Preclusion list

Preclusion List

- Applies to individuals/entities
- Currently revoked and under an active re-enrollment bar, or
- Could have revoked if enrolled in Medicare; and
- Conduct that led to the revocation is considered detrimental to the Medicare program

50% of revoked felons continue to prescribe opioids to Medicare beneficiaries
Question & Answer Session
Business Structures and Ownership/Managing Control
Sole Proprietors

- One person owns the business
- Unincorporated
- The individual may bill under their SSN or an EIN
- If the business has an EIN, it will be under the owner’s name and not a business name
- May have employees

Structure:
- Sole Proprietor
  - Who?
  - You
  - Control
  - Tax
  - Liability
Sole Owner LLC and Corporations

- A separate and distinct entity from the owner
- Incorporation documentation submitted to the State
- EIN will be under the business name
- Owner is shielded from liability, only the business can be sued and liable for debts
Direct vs Indirect Ownership

- Any organization or individual that has at least 5% ownership of the assets of the supplier
- Includes partnership interest
- Government entities would only list the county in Section 5 and any employees who run the provider’s operations in Section 6.

Example:
The supplier Medical Clinic Inc., is owned by Forest Labs LLC, Dr. John Sparks and Dr. Amelia Crews. The doctors have a partnership. Forest Labs LLC would be reported in Section 5 as a 5% Owner and each doctor would be reported in Section 6 as 5% Owners.
Foreign Ownership

- Any individual or organization submitted in Sections 5/6 of an CMS-855 application must supply a valid TIN:
  - Employer Identification Number (EIN)
  - Social Security Number (SSN)
  - Individual Taxpayer Identification Number (ITIN)

- If an individual or organization is not legally eligible to obtain a TIN or ITIN, documentation must be submitted to provide an explanation.
Managing Employees

- Any individual that has operational or managerial control of the day to day business decisions and operations
- May be a W-2 employee or contracted
- Any enrolling supplier must include at least one managing employee
- A managing employee is optional for Individuals enrolling via the CMS-855I
Resources

cms.gov
- ordering and referring, DMEPOS accreditation, supplier standards, part D enrollment
- CMS-855 processing guides
- MAC contacts: (search for Medicare enrollment contact”)

cms.gov/Revalidation
- search all records online
- view and filter online spreadsheets
- export to Excel, or connect to with API

PECOS.cms.hhs.gov
account creation, videos, providers resources, FAQs

ProviderEnrollment@cms.hhs.gov
Provider Enrollment contact

FFSProviderRelations@cms.hhs.gov
“ListServ” sign-up: Notice of program and policy details, press releases, events, educational material

888-734-6433
PECOS Help Desk (EUS)

cms.gov MLN Matters® Articles
articles on the latest changes to the Medicare Program and enrollment education products
CMS-855 Processing Guides

For Providers | For MACs


CMS | National Provider Enrollment Conference | March 2019
“Verification must occur of licenses and or certifications. The only licenses that must be submitted with the application are those required by Medicare or the state to function as the supplier type in question. Licenses and permits that are not of a medical nature are not required, …

If the MAC is aware that a particular state does not require license/certification and the “Not Applicable” boxes are not checked in Section 2C, no further development is needed. “

“Communications regarding the processing of the CMS-855R shall be sent to the contact person listed. If multiple contact persons are listed, the MAC shall contact the first contact person listed on the application. If they are not available, the MAC shall contact the other person(s) listed, unless the individual practitioner indicates otherwise via any means.”
“A physician/eligible professional need not submit a copy of his/her degree unless specifically requested to do so by the MAC. To the maximum extent possible, the MAC shall use means other than the physician’s submission of documentation—such as a State or school Web site—to validate the person’s educational status.”

“If the physician/eligible professional is submitting an initial enrollment application a PTAN need not be listed, as one has not been assigned; the physician/eligible professional can enter the word “pending” in this field or leave the field blank.

If the 855O enrollment is being terminated, the PTAN should be listed… The MAC may use the shared systems, PECOS, or its provider files as a resource for determining the PTAN before developing for this information.”
“On the CMS-855I, the physician must indicate his/her supplier specialties, showing "P" for primary and "S" for secondary. The provider may select only one primary specialty but may select multiple secondary specialties. A physician must meet all Federal and State requirements for the type of specialty(s) checked....”

“The physician assistant must furnish his/her NPI in section 1 of the application, and must list his/her employers in section 2E. Since PAs cannot reassign their benefits – even though they are reimbursed through their employer – they should not complete a CMS-855R.....”
Thank You

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Centers for Medicare & Medicaid Services