

## Medicare & Medicaid

# **Provider Enrollment**

**Decision Health** 

April 2017

**Centers for Medicare & Medicaid Services** 

Center for Program Integrity

Provider Enrollment & Oversight Group

**Presented by** 

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## First thoughts



2

3

## Listening to you

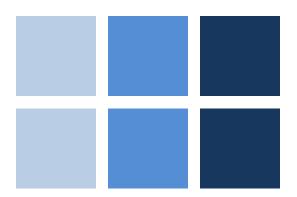
We hear you, and we've learned a lot from you.

## Finding a balance

We believe enrollment should be **easy** for most providers, and **hard** for bad actors.

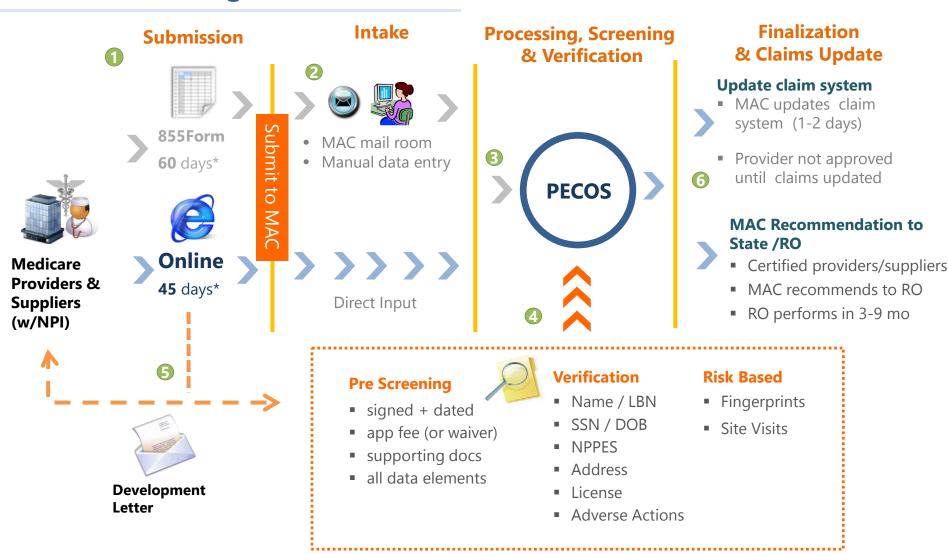
## **Always improving**

We will keep refining our systems, policies, transparency, and our vision.



# How enrolling works

## How enrolling works



<sup>\*</sup> If the app is complete, and no site visit

## What causes delays?



need at least 1 round of corrections 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

### How the MAC develops for missing information

#### Contacts the...

- 1. Contact person (sec 13)
- 2. Individual provider (sec 2)
- 3. Auth or Del Official (sec 15/16)

#### By...

- email
- fax
- phone
- letter

# 30

days to respond

#### No response?

- delays
- rejections
- later effective date

## Medicare effective dates | Part B

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)

## **Provider seeking effective date**JUNE 1

## **Option A: Early Submission**

Physicians / Groups can apply **60 days** prior \*\*

MAC
receives
app
APR 1

MAC
approves
MAY 15
(w/ effective
June 1)

Provider performs service
JUNE 1

MAC PROCESSING

MAR APR MAY

JUN JUL

**AUG** 

SEP

OCT

#### **Option B: Late Submission**

Physicians / Groups effective date up to **30 days prior to submission date** \*\*\* Provider performs service

JUNE 1

MAC

MAC

approves

SEPT 1

(w/ effective June 1)

<sup>\*\*</sup> Must be in compliance at requested effective date (operational, licensed)

## Medicare effective dates | Part A

Effective date is based on:

- Completion of survey
- Regional Office determines all requirements are met

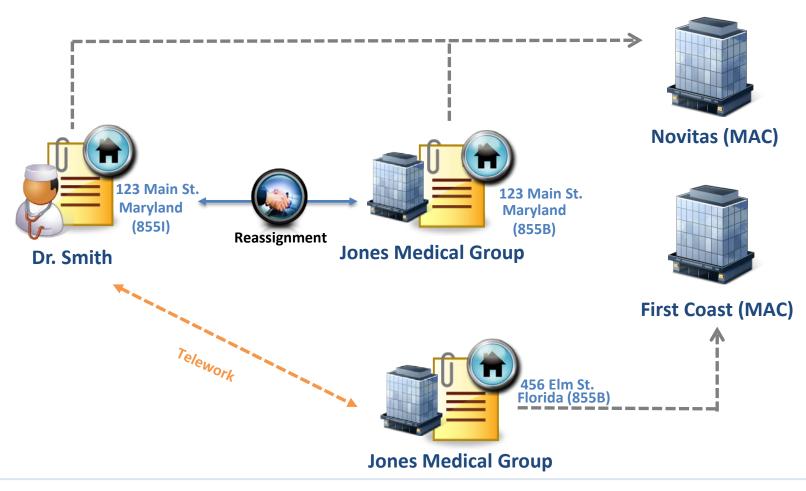
**Provider seeking effective date** OCT 1 2016

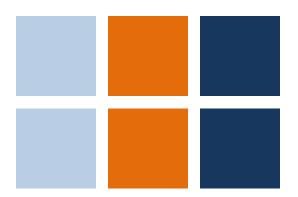


<sup>\*\*</sup> Must be in compliance at requested effective date (operational, licensed)

## **Enrollment Arrangements (Telehealth)**

## MM8545 | Inter-jurisdictional





# **Policy Updates**

## Authorized and Delegated Officials – PECOS & I&A



**Identity & Access Management System** 

#### **Authorized Official**



with authority to report changes to enrollment information

Appointed by the 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

 ownership, control, or W-2 managing employee

- multiple DOs permitted
- may sign changes, updates and revalidations (cannot sign initial application)

**Delegated Official** 

#### **Authorized Official**



Assign surrogacy and controls access to PECOS and NPPES records

- less restrictive AO requirements than PECOS
- automatically approved if listed as AO in PECOS
- if not, CP575 must be provided to approve access
- manage staff and connections for the employer
- approve DOs for the employer

**Delegated Official** 

Authority to assign surrogacy and controls access to PECOS and NPPES records

- delegated by the AO of org provider or 3rd party org
- may add the employer to his profile, manage staff and connections for the employer
- multiple DOs permitted

## Who can sign the enrollment application?

855 A

B

Initial: Only the organization's Authorized Official (AO)

Changes and revals: Either the AO or Delegated official (DO)

855 I

0

**All app types:** Only the individual provider

855 **R** 

**Adding**: Both the individual provider and the org's AO/DO.

Changing/terminating: Individual provider or the org's AO/DO.

## Certification statement requirements

Certification Statements:	Paper	Web
MAC develops for <u>invalid</u> cert statement with other missing items	X	X
MAC develops for <u>missing</u> cert statement with other missing items (if web signature is missing, MAC will not proceed)	X	
MAC processing won't start until signed cert statement is received (within 20 days of submission, otherwise rejected)		X
paper signatures accepted through email, fax, (if original on file) or mail	X	X
paper cert statements downloaded from cms.gov must include the web tracking ID		X

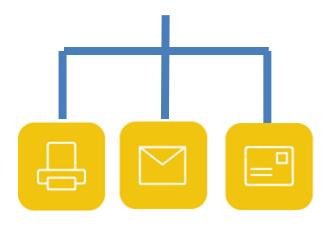
#### **Invalid signatures...**

- 1. Unsigned
- 2. Undated
- 3. Copied/stamped signatures
- 4. Wrong person signed

#### No response?

- rejections
- delays
- later effective date

## Contact person



- 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. Auth or Del Official (sec 15/16)

#### **By...**

- email
- fax
- letter

Addition of contact persons must still be reported on appropriate CMS-855

## Updates to Program Integrity Manual

- MACs should not call to speak directly to providers reporting a change in specialty
- MACs should not request a diploma or degree unless education requirements cannot be verified online
- **■** MACs should not request a SSN card or driver's license for identification.

- MACs should not request a phone, utility, power bill or lease to validate LBN or DBA
  - Lease only required to validate exclusive use of facility for PT/OT or ambulance suppliers leasing aircraft

## Updates to Program Integrity Manual

#### **☐** Reassignment effective dates

- based on later of the date of filing or the date the reassignor first began furnishing services at the new location
- consistent with initial applications
- applies to CMS-855R accompanied by an initial CMS-855I and stand-alone CMS-855R

#### ☐ CMS-855R processing guide

- addendum to PIM chapter 15 on CMS.gov
- used by MACs and providers
- includes application completion and processing instructions

#### ☐ CMS-8550 processing guide (Coming Soon)

- addendum to PIM chapter 15 on CMS.gov
- used by MACs and providers
- includes application completion and processing instructions

## CMS-855R Processing Guide

## For Providers | For MACs

```
Downloads
Chapter 1 - Overview of Medical Review (MR) and Benefit Integrity (BI) Programs (PDF, 113KB) 1
Chapter 2 - Data Analysis (PDF, 75KB) 1
Chapter 3 - Verifying Potential Errors and Taking Corrective Actions (PDF, 664KS) *
Chapter 4 - Program Integrity (PDF, 670KB) 5
Chapter 5 - Items and Services Having Special DME Review Considerations IPDF, 178KBI **
Chapter 6 - Medicare Contract
Chapter 7 - MR Reports JPDF
                             Chapter 15 - Medicare Enrollment [PDF, 1MB] 7
Chapter 8 - Administrative Act
                             Chapter 15.5-Processing Guide-855R [PDF, 190KB]
Chapter 9 - Reserved for Fulu
Chapter 10 - Reserved for Future Use prom. 113929 30
Chapter 11 - Fiscal Administration JPDF_97KB[ **
Chapter 12 - The Comprehensive Error Rate Testing Program (PDF, 125KB) **
Chapter 13 - Local Coverage Determinations (PDF, 21943) **
Chapter 14 - Reserved for Future Use IPDF, 26KBI **
Chapter 15 - Medicare Enrollment (PDF, 1MB) **
Chapter 15.5-Processing Guide-855R JPDF, 190KBJ 5
Exhibits (PDF, 2MB) $
```

## CMS-855R Processing Guide

## For Providers | For MACs

"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. "

#### Section 2: Identifying Information

"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."

## CMS-8550 Processing Guide

## For Providers | For MACs

This section identifies the reason the physician or non-physician practitioner is registering so to order and refer. Only one reason should be checked. If a reason is not identified, the MA/ shall send a development request to the provider/contact person to obtain the missing data.

"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 8550 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."

## Updates to CMS-855 Enrollment Applications

#### ☐ CMS-8550

- must use revised version beginning Jan 2018
- title changed for use by prescribers
- added Interventional Cardiology and 5 other specialties; Oral Surgeons (Dentist Only)
   split into Oral Surgeon and Dentist
- providers are able to add an additional contact person (optional)

#### ☐ CMS-855S

- must use revised version beginning Jan 2017
- split "external infusion pumps and/or supplies" and "insulin infusion pumps and/or supplies" into two separate products
- deleted "Hemodialysis Equipment and/or Supplies" and "Home Dialysis Equipment and/or Supplies"
- replaced "Invasive Mechanical Ventilation Devises" with "Ventilators: All Types Not CPAP or RAD"

## Updates to CMS-855 Enrollment Applications

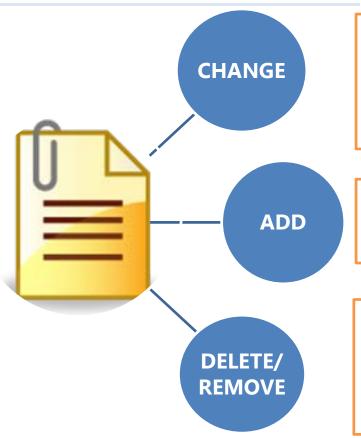
#### ☐ CMS-588 (EFT)

- must use revised version beginning Jan 2018
- indicate if EFT is for an ind or org (Reason for Submission/Account Holder Information)
- financial institution's contact person (optional)
- additional digits added to account number to make consistent with industry standard

#### ☐ CMS-855 POH

- POHs are <u>not</u> required to submit a completed CMS-855POH or Attachment 1 (CMS-855A) as of Mar 2015
- future instruction will be provided on the CMS physician self-referral website at <u>https://www.cms.gov/medicare/fraud-and-abuse/physicianselfreferral/physician\_owned\_hospitals.html</u>

## 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 reentry

#### **Applicable CMS-855 sections** (change/add/delete options)

- 1. Location information (855A/855B/855I/855S)
- 2. Ownership/Managing Control (855A/855B/855I/855S)
- 3. Billing Agency (855A/855B/855I/855S)
- 4. AO/DO (855A/855B/855S)
- 5. 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

## Provider Enrollment Moratoria

2013 2014 2016 2017

## Initial implementation

#### July 2013

- HHA and HHA sub-units (Miami, Chicago)
- Ambulance and ambulance suppliers (Houston)

#### **Expanded and extended**

#### Jan 2014

- HHA and HHA sub-units (Miami, Ft. Lauderdale, Detroit, Dallas, Chicago)
- Ambulance and ambulance suppliers (Houston, Philadelphia, surrounding New Jersey)

# For n

#### Lifted

#### Jul 2016

 Emergency ambulance services

## **Expanded and extended**

#### Jul 2016

- State wide
- HHA and HHA sub-units (Florida, Illinois, Michigan, Texas)
- Non-emergency ambulances and ambulance suppliers (New Jersey, Pennsylvania, Texas)

#### **Extended**

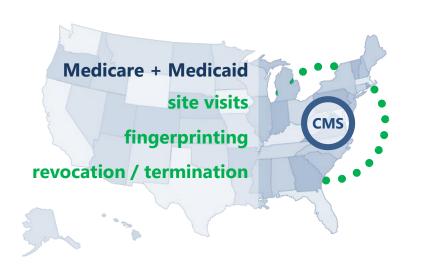
#### Jan 2017

- State wide
- HHA and HHA sub-units (Florida, Illinois, Michigan, Texas)
- Non-emergency ambulances and ambulance suppliers (New Jersey, Pennsylvania, Texas)

For more information refer to the Federal Register notice at https://www.federalregister.gov

## Medicaid Provider Enrollment

## CMS Center for Program Integrity manages Medicare and Medicaid enrollment.



## **Advantages**

#### **Less burden for states and providers**

In some cases, states can screen Medicaid providers using our Medicare enrollment data (site visits, revalidation, application fees, fingerprinting).

#### More consistency among states

Clearer sub-regulatory guidance Each state has a CMS point-of-contact

# Medicaid Provider Enrollment Compendium (MPEC)

Similar to the Medicare Program Integrity Manual

## Medicaid Provider Enrollment Compendium

- for State Medicaid Agencies (SMA) and providers
- guidance on federal Medicaid enrollment standards (42 CFR 455 Subparts B, E)
- states may be stricter than Federal regs
- find at <a href="https://www.medicaid.gov/affordable-care-act/downloads/program-integrity/mpec-142017.pdf">https://www.medicaid.gov/affordable-care-act/downloads/program-integrity/mpec-142017.pdf</a>

#### sample guidance

**Revalidation** (Section 1.5.2, 1.5.3)

- required every 5 years (includes ordering and referring physicians)
- discretion to require revalidation on a more frequent basis
- conduct full screening appropriate to provider's risk level
- may rely on Medicare or another state's screening

#### **Approval letters** (Section 1.7)

 SMAs should not request MAC "welcome letter" as a condition of provider enrollment

#### Ownership Discrepancies (Section 1.5.3)

 SMAs recommended to report ownership discrepancies for dually enrolled providers

#### **Retroactive Dates of Service** (Section 1.6B)

 SMA makes determination to grant a retroactive billing date based on compliance

## Medicare/Medicaid Managed Care



Medicaid Managed Care network providers that furnish, order, refer or prescribe must:

#### enroll in Medicaid

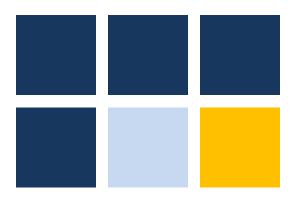


Providers in a Medicare Advantage organization network must:

#### enroll in Medicare

#### **Reduces fraud**

- 1. Ensures compliance with enrollment requirements across all programs
- 2. Ensures services are provided by qualified providers
- 3. Ensures consistency across CMS programs



## Revalidation

#### Revalidation basics

# 5-year cycles

3-year for DME suppliers

# When is your revalidation due? go.cms.gov/MedicareRevalidation

- Lists all affected, 6 months out
- MACs will send notices 2-3 months prior
- Always due on last day of the month
- List includes all reassignments

# We email the PECOS contact for development

- If multiple contacts exist email most recent on file
- No phone calls
- If no email address, we mail to: correspondence and special payment addresses and/or practice location address

#### **Large Group Coordination**

- We mail an "FYI" to large groups every 6 months, with a spreadsheet of every relevant provider (name, NPI, and specialty)
- MACs can now ask one contact to verify multiple practice locations

#### **Response Rate**

79%

60
days to respond

#### No response?

deactivate (not revoke)

#### Late revalidation?

- break in billing
- new effective date

### Revalidation details

#### **Unsolicited revalidations**

- if your record's due date is "TBD", do not send an application
- CMS will accept applications submitted within 6 months before due date, any application submitted beyond this timeframe will be returned
- if you want to *update or change* your enrollment record, send the relevant 855 form

#### **Deactivations**

- if you don't provide a complete revalidation your Medicare billing privileges will be deactivated
- respond to all development requests by your MAC within 30 days
- if we deactivate you, you need to resend a complete enrollment application for reactivation
- if CMS reactivates you, you keep your old PTAN, and you are reactivated to the receipt date of the new application

#### Revalidation details

#### **Changes received prior to revalidation**

- change of information applications received prior to the revalidation notice being mailed are processed as normal
- MAC will still mail revalidation notice
- changes reported within 6 months of revalidation due date are not required to be reported on the revalidation application
  - MAC will process the change and proceed with processing the revalidation
  - MAC will not override the previous changes

## Revalidation timeline

	CMS (MAC) action	Timeframe	Sample timeline	
1	post to the Revalidation list notify large groups	6 months before	MAR 30, 2017	
	send notice (email or letter)	2-3 months before	JUN 30, 2017	provider sends revalidation
	Revalidation	due date	SEP 30, 2017	
	deactivate billing privileges for non-response	due date	SEP 30, 2017	

## Missing reassignments – no break in billing

#### Scenario #1

- Revalidation application sent with missing reassignments.
- Response received before due date

Application Received	04/01/2017
Development Letter Sent	05/15/2017
Development Due	06/15/2017
Development Received	06/10/2017
Revalidation Due	05/31/2017
Revalidation Complete	06/30/2017

- Revalidation notice includes reassignments for Groups A, B & C
- Revalidation application is received but only addresses reassignment for Group A.
- MAC develops to Contact Person for missing reassignments for Groups B & C
- Provider responds with information for Groups B & C prior to the revalidation due date or the development due date (Section 1, 2, 4 & 15 of the 855I or a full 855I)
- No break in billing

## Missing reassignments – break in billing

#### Scenario #2

- Revalidation sent with missing reassignments.
- Response received after due date

Application Receipt	05/01/2017
Development Letter Sent	05/15/2017
Development Due	06/15/2017
Revalidation Due	05/31/2017
nerandation 2 de	03/31/2017
Reassignment End	06/15/2017

- Revalidation notice includes reassignments for Groups A, B & C
- Revalidation application is received but only addresses reassignment for Group A
- MAC develops for missing reassignments for Groups B & C
- No response received from provider
- Group A's reassignment is revalidated.
   Groups B & C's reassignments are deactivated effective with the latter of the revalidation due date or the development due date
- Provider submits a reactivation application after the due date (full 855R required)
- Effective date for Groups B & C is based on receipt date of reactivation application
- Break in billing

#### **Medicare Revalidation List**

Medicare providers must revalidate their enrollment record information every three or five years. CMS sets every provider's revalidation due-date at the end of a month, and posts the upcoming six months online. A due date of "TBD" means that CMS has not set the date yet.

CMS offers several ways for you to view and group the revalidation dates of every provider:

- · This data was last refreshed on March 1st, 2017
- Revalidation due dates included on this list range between March 31, 2016 and September 30th, 2017
- The next data refresh is tentatively scheduled for May 1st, 2017
- Affiliations now include Reassignments as well as PA Employment Relationships
- Data now includes DME Due Dates between November 1st 2016 and September 30, 2017
- DME Suppliers are identified on the downloadable file in a new column called "Enrollment Type" and are identified as "1"

#### Search all records

Quickly view specific providers or suppliers online.

Individual Last Name OR Organizatio	n Name
Individual First Name	
NPI 🕖	State
all records	
O only records with due dates	
O records due within a date range	

#### Online tables

Browse, search, and filter the entire list online, then save to a file. (Some advanced features of each spreadsheet are intended for data specialists)

#### 1. Group practice members only

A-D | E-L | M-R | S-Z

Search list of all group records and their reassigned members.

2. Entire list of providers and suppliers

Search list of all provider and supplier enrollment records.

3. Reassignments and PA Employment relationships

For data specialists: Export this table and "join" it with Table 2 to create advanced group queries. Refer to the data dictionary (PDF) for more options.

How to use the online tables:

- · Sort on a column by clicking its grey header
- . Search with the [Find in this Dataset] search bar
- · Filter the data by clicking the blue [Filter] button
- · Download the file by clicking the light blue [Export] button

Search

#### data.cms.gov/revalidation

## 3 sets of data files

## for online filtering and download

as Microsoft Excel, comma-delimited text files, xml...

1. Group practice members only (recommended)

For finding reassignments to your group All group records and their reassigned members Split into four files, alphabetically

2. Entire list of providers and suppliers

A search list of all enrollment records, used for finding any provider/supplier.

3. Reassignments and PA Employment relationships

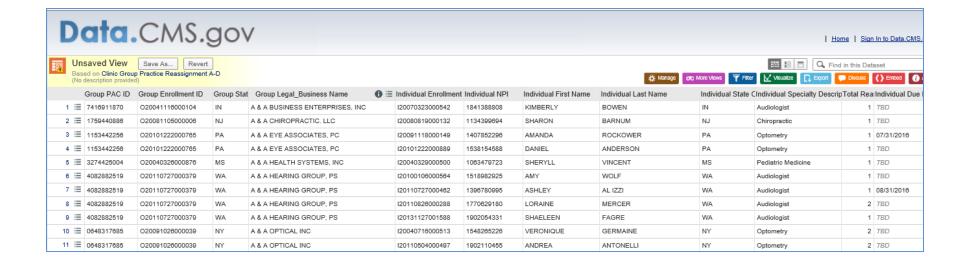
Technical staff can "join" this with data file #2 to create advanced group queries

# Looking for reassigned providers? Use "Group practice members only"

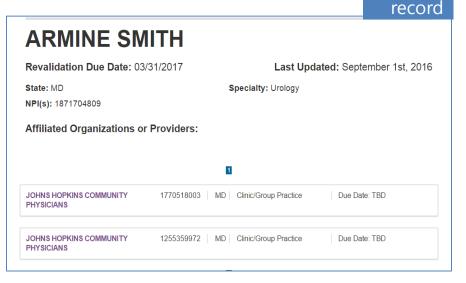
- sort, download and save by large groups
- includes all individuals that reassign to the group
- shows the individual's total number of reassignments

#### **Sort and filter by:**

- Group Enrollment ID, State, and LBN
- Individual Enrollment ID
- Individual NPI
- Individual State
- Individual First and Last Name
- Individual Specialty Code
- Individual Revalidation Due Date
- Total Reassignments







#### **Recent enhancements**

results displayed alphabetically and by Due Date

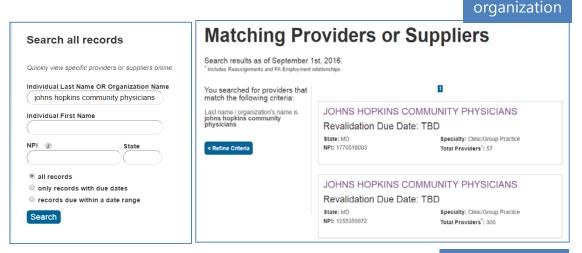
> by organization name / last name, then by nearest due date (with TBD last)

records include details and links to all affiliated records (e.g. Individual records show details on affiliated organizations or providers, plus a link to the group's record)

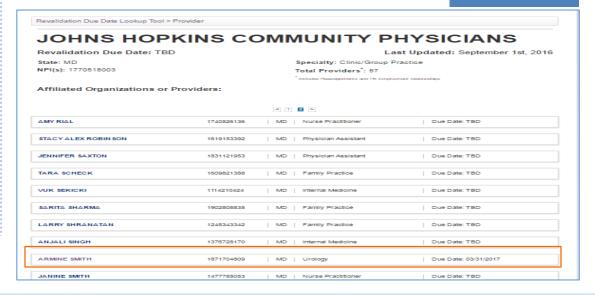
# Revalidation lookup tool

# Search by: Organization Name or NPI

- search results show #of reassignments &physician assistants
- records will include
  details and links to
  all affiliated records
  (e.g. group records show
  details on affiliated
  individuals, plus a link to
  the individual record)

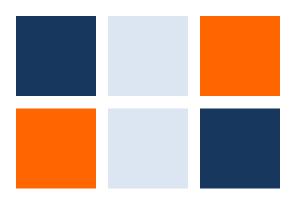


#### affiliations



## Revalidation

- Changes we've made:
  - Advanced notice of your revalidation due date
  - Search and download all reassignments
  - Reassignment information on revalidation notices
- How you can help:
  - Talk to your provider
  - Use the revalidation look up tool
  - Respond timely
  - Set up your connections in I&A now
  - Use PECOS to submit your revalidation



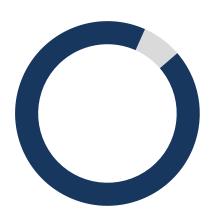
# Our systems

## NPPES (NPI) today

# 5 million NPIs

## **Every month...**

**23**,000 new NPIs **68**,000 updates



94% created online

76% individuals

24% organizations

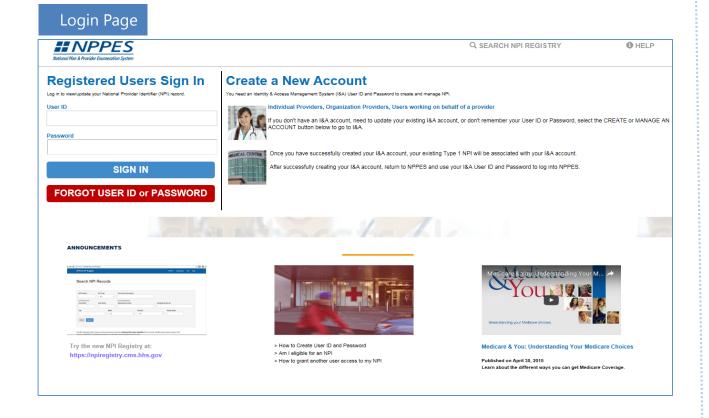
# **Challenges**

- low usability / readability
- targeted to providers, not admins
- old technology, narrow design
- strict customer service policies
- all lead to... outdated records

## **In Summer 2017...**

- new design with easier screens
- surrogacy (like PECOS)
- more data fields
- improved customer service

# NPPES Redesign | coming very soon



YouTube video introducing the new NPPES:

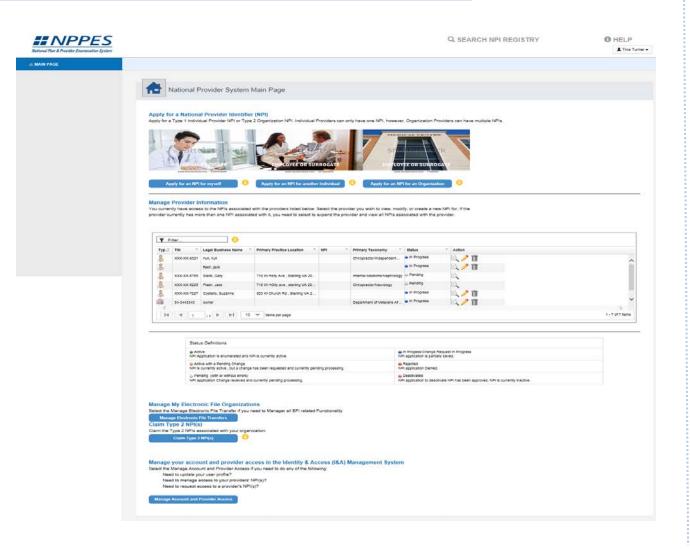
https://youtu.be/BOJCAj1P2u8

"Getting Ready for the new NPPES" FAQ:

https://nppes.cms.hhs.gov/NPPES/powerpoint/GettingReadyForTheNewNPPES.pptx

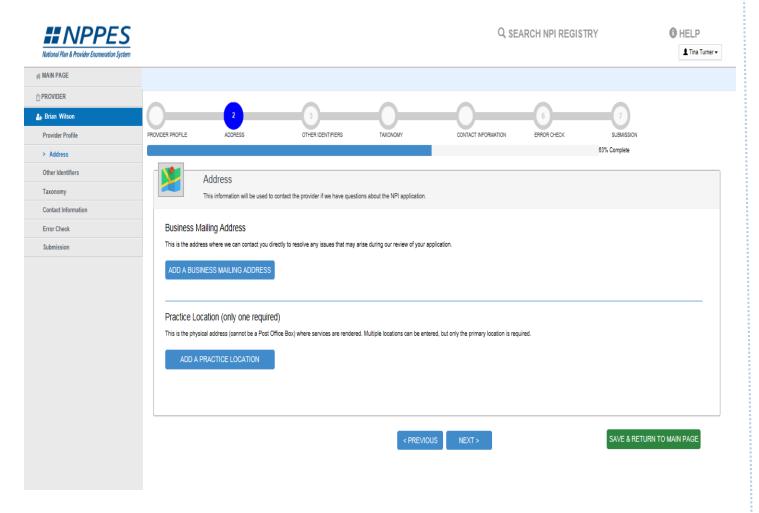
- ✓ **Single Sign on** for both Type 1 & 2 users
- ✓ Modernized &
   Easy to use Streamlined data entry
- ✓ Context sensitive Help and Smart Filters
- ✓ Print or download a PDF version of the NPI application upon submission

# **NPPES Redesign** | Main Page



- ✓ Ability for surrogates to work on behalf of providers to create/update NPI records
- ✓ One Userid and Password to access NPI records
- ✓ Ability to request initial NPI notification to be sent to the contact person on file

# NPPES Redesign | Address Page



- ✓ Multiple Practice Locations
- ✓ AddressStandardization
- ✓ Partial Application Save

# **NPPES Redesign** | Taxonomy Page



#### Taxonomy

Provider's Taxonomy and License Information:

You are required to identify at least one taxonomy to associate with your NPI. If you identify more than one, you must identify which one is the primary taxonomy. Provider Taxonomy codes and their description can be found on the Washington Publishing Company's web page at http://www.wpc-edi.com/codes/taxonomy.

To enter a taxonomy code, start by entering either the taxonomy code, classification code, or specialty in the search box. All taxonomies containing the data you enter will display allowing you to select the appropriate one. Once you have selected the appropriate Taxonomy code, the corresponding fields below the search box will be populated. Complete your taxonomy code entry by entering the License and State information.

You have indicated on the Provider Profile page that the Provider is a Sole Proprietor.

- Practice Type 
  Not a Group Multiple-Specialty Multiple Single Specialty

  Classification Name/Specialization

  License Number

  State Issued

  CLEAR

- ✓ Streamlined taxonomy entry
- ✓ Ability to easily change primary taxonomy
- ✓ Links to taxonomy definition websites

SAVE

# PECOS Today

# 2 million enrollments

**Every month...** 

**18**,000 new enrollments



**45%** 

created online

## **Encouraging Online Applications**

- My associates Page
- Better navigation
- Part D Easy Enrollment

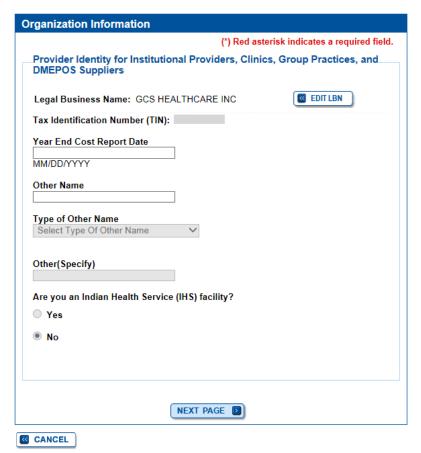
## **Communication + Efficiency**

- review and update NPI records during PECOS updates
- include additional information on emails (NPI/Medicare ID)
- enhancements to Supporting Docs
- sort data in alphabetical order

## **PECOS Changes** | recent updates

#### **Removal of EIN Effective Date**

The EIN Effective Date field has been removed from the Organization Information topic for all submission types (initial enrollment, change of information, revalidation, and reactivation).



Home > My Associates > My Enrollments > Change of Information > Organization Information > EDIT

Help

Year End Cost
Report Date

Other Name (Organization)

Additional

Resources

How to Guides

Who Should I Call?

[PDF, 214 KB] 🔄

Application Status
Kiosk

Additional Links 🖵

FAQs 🔄

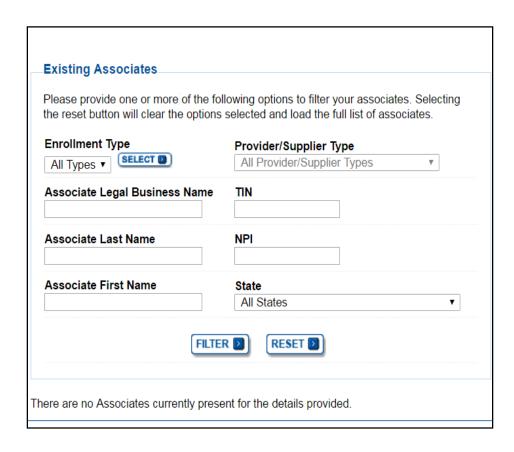
Glossary 🗁

# **PECOS Changes** | recent updates

## **My Associates Page**

# Ability to filter on the following elements:

- Enrollment, ProviderType
- Associate Legal
   Business Name
- Associate Last Name ,
   First Name
- TIN , NPI (Exact match)
- State/Territory



# **PECOS Changes** | recent updates

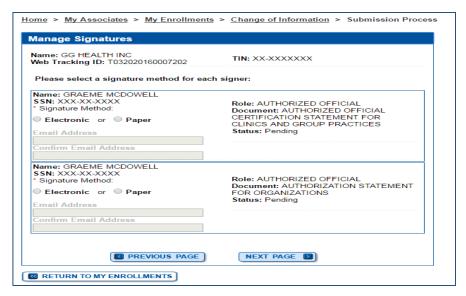
### **Reassignment Enhancements:**

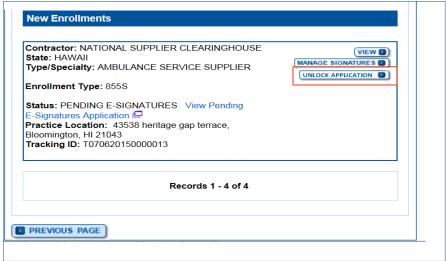
 Change/Terminate a Reassignment -Only the AO or Individual needs to sign

## **PI Unlock Application Feature:**

PI users will have the ability to unlock applications that have been submitted if the following conditions are met:

- All Signatures have not been received by the MAC
- All Signature options are E-Signatures







### What is Easy Enrollment?

Simplified, easy to use application, designed to enable users to submit an 855O enrollment in fraction of the time

Mobile accessibility and easy authentication

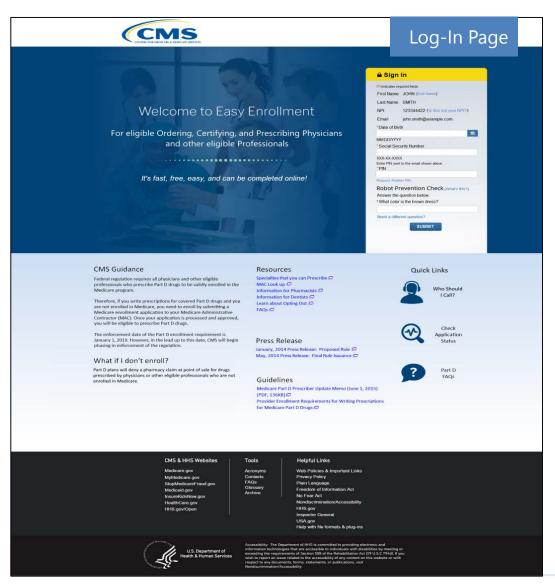
#### Data.CMS.Gov

https://data.cms.gov/855OEasy Enroll

Search and Click 'Enroll Me Now'

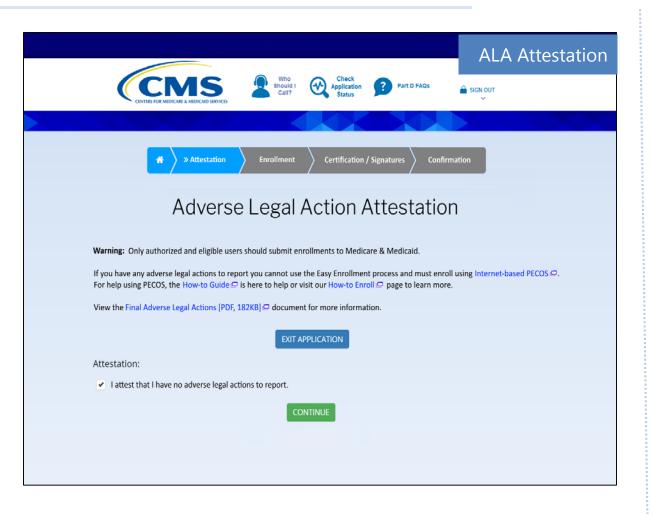
### **PECOS PIN Request Page**

Enter Email Address and request Secure PIN



### **Easy Enrollment Log-In**

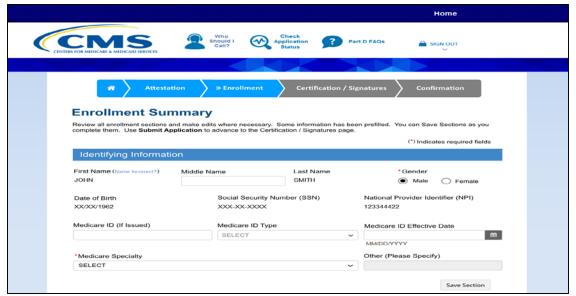
- Enter Valid SSN and DOB for the Prescriber
- ✓ Successfully pass SSA and NPPES validation
- Enter system issued secure
   PIN for the email address
- ✓ Successfully complete Robot Prevention Check question

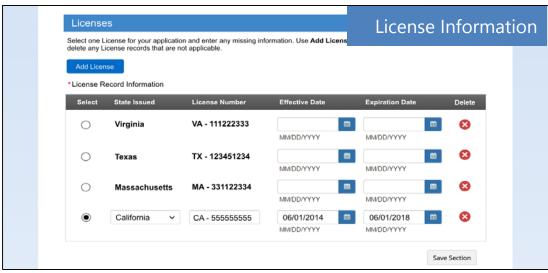


# Adverse Legal Action Attestation

Only prescribers who do not have any Adverse Legal Actions to report may complete an Easy Enrollment

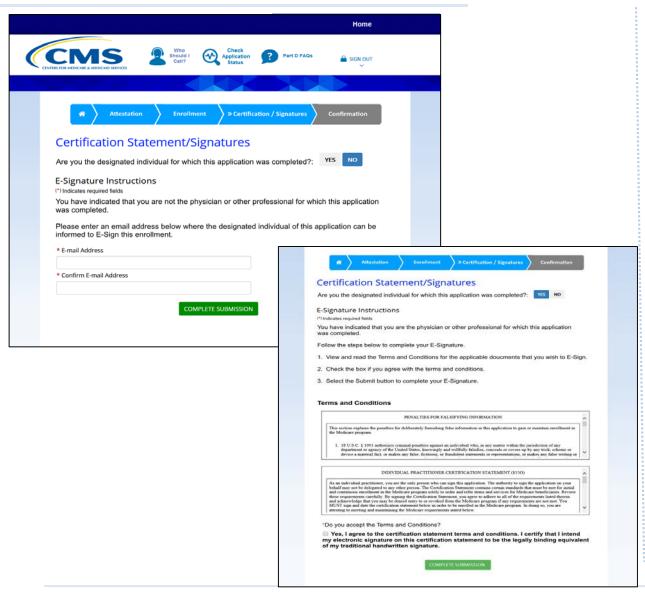
Those prescribers who do have Adverse Legal Actions are encouraged to use Internet based PECOS to submit an electronic 855O application





### **Enrollment Summary**

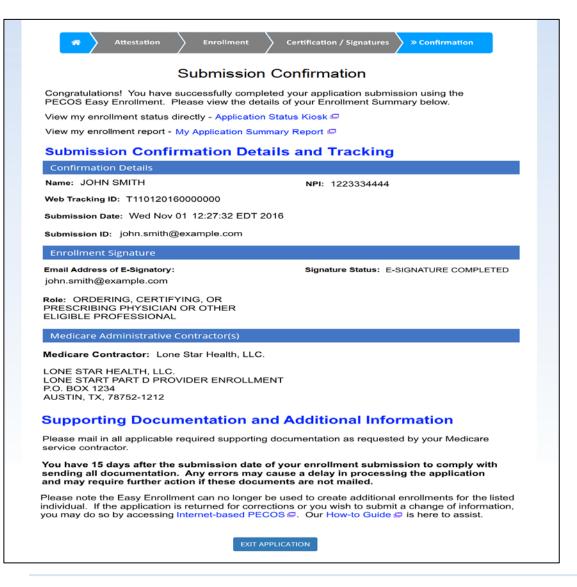
- ✓ Pre-filled single page design
- ✓ Improved usability experience limits clicks and allows users to submit an application in fraction of the time it takes currently
- ✓ Enter License information to route application to the appropriate contractor



#### **E-Signature Page**

Provider can E-Sign directly on the application

Surrogate users can submit an E-Signature Request by entering the email address of the appropriate Provider



# **Submission Confirmation Page**

- Provides tracking information on the submitted application
- ✓ Provides access to the Medicare Enrollment Report and the Application Status Kiosk to check the status of your submitted application
- ✓ Provides information on the Contractor who will process the application

# Physician Compare

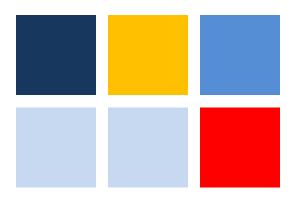
# medicare.gov/physiciancompare

- Public directory of healthcare providers in Medicare.
- Based mostly on PECOS; updated twice a month



**Learn more:** Search "physician compare" at cms.gov

**Get support:** PhysicianCompare@Westat.com



# Protecting the program

# Stronger screening

## **Increase site visits**

- for high Medicare reimbursements
- in high risk geographic areas

## Find vacant or invalid addresses

- better automatic address verification in PECOS
- includes US Postal Service feature that confirms the address is real
- may trigger a site visit

# **Deactivate for non-billing**

EXEMPTIONS: order/refer/prescribe; certain specialties
 e.g., pediatricians, dentists and mass immunizers (roster billers)

**Authority:** 42 CFR 424.517

# Fingerprinting



## **CMSfingerprinting.com**

### **Applies to:**

- new HHAs
- new DME suppliers
- high risk providers /suppliers

# 5%<sup>(+)</sup> ownership/partners

in a high risk provider/supplier

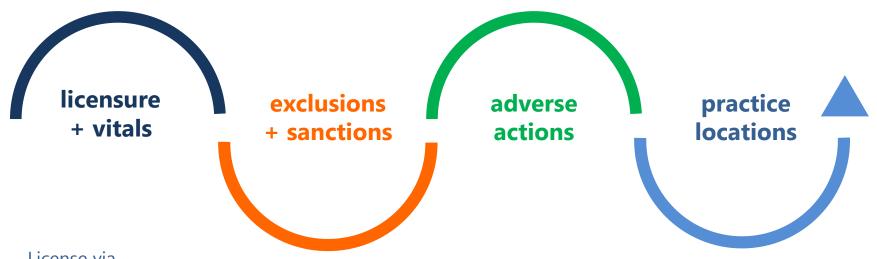
- Phased rollout
- MACs will send a letter
- 30 days to get fingerprinted

### If the provider/supplier:

- has a criminal record
- refuses fingerprinting

then CMS could deny the application, or revoke their billing privileges

# Continuous monitoring



License via
Automated screening

SSA Death Master File

NPI and LBN Integrated via NPPES OIG and GSA websites Integrated in PECOS Monthly checks Criminal alerts via Automated screening Ad hoc site visits

# Data sharing

## **Across CMS programs**

- HITECH
- Accountable Care Orgs
- DME Competitive Bids
- States



#### **Public data files from PECOS**

- all files contain Names and NPIs
- available at data.cms.gov

# Part D Prescriber File

- all Individuals
- eff. periods for prescribing
- opt-out
- updated weekly

#### **Revalidation File**

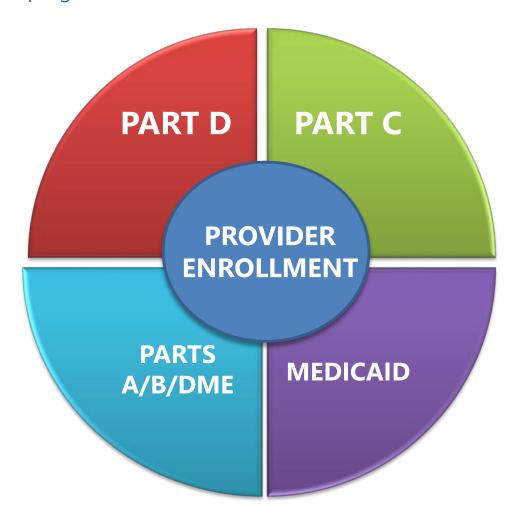
- currently approved,and due for revalidation
- individuals and orgs
- revalidation due date
- Reassignments
- updated every 60 days

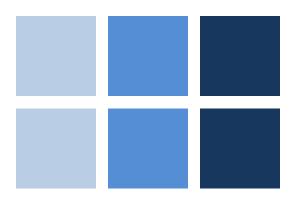
# **Public Provider Enrollment File**

- currently approved individuals and orgs
- reassignments
- practice location data (limited)
- primary andsecondary specialtyupdated quarterly

# Connections between all programs

Failure to maintain accurate enrollment data could impact your participation in other Medicare & Medicaid programs





# **Enforcement Actions**

# Adverse legal actions

## **Required during:**

- initial enrollment
- revalidation (even if previously reported)
- within 30 days of the action

## Applies to.....

- ind providers
- inds and orgs in section 5/6 (owners, managing employees, AO/DO)

## Failure to report...

- deny application or revoke billing privileges
  - possible revocation back to the date of the action (felony, sanction, exclusion)

## x felony conviction in last 10 years

- crimes against persons
- financial crimes
- x misdemeanor conviction
  - patient abuse or neglect
  - theft, fraud, embezzlement
- x sanction or exclusion (ever)
- x license revocation or suspension (ever)
- x accreditation revocation or suspension (ever)
- Medicare payment suspension (current)
- x Medicare revocation (ever)

# Reasons to deny

## **CMS can deny Medicare applications for:**

- x felony conviction
- x DEA suspended or revoked
- x Medicare payment suspension (active)
- x excluded from federal program
- x insufficient capital (HHA)
- **x** false or misleading information
- x fee not paid (including if hardship exception denied)
- x noncompliance: program requirements
- **x** on-site review, showing noncompliance
- x temporary moratorium
- x \$1,500 overpayment (current) ...... Unless:
  - approved repayment plan
  - offset or appeal
  - bankruptcy

A/B JAN 2016 | DME APR 2016

## Reasons to revoke

### CMS can revoke Medicare billing privileges for:

- x felony conviction
- x DEA suspended or revoked
- x Medicaid billing privileges terminated
- x excluded from federal program
- x pattern or practice of prescribing
- x non-operational (onsite visit)
- x insufficient capital (HHA)

# 1-3 year

Re-enrollment bar

- x abuse of billing privileges
- x misuse of billing number
- x false or misleading information
- x fee not paid (including if hardship exception denied)
- x noncompliance: document requirements
- x noncompliance: program requirements
- x failure to report to MAC...

...in 30 days: ownership change, practice location change, adverse legal action

...in 90 days: all other information

- Must report to the MAC.
- Notifying a state, Regional Office, or another agency is not enough.

## How to appeal

### **1 Corrective Action (CAP)**

For all denial reasons, but only noncompliance revocation reason Simply correct the issue:

- send CAP within 30 days
- MAC/CMS has 60 days to process

#### **2** Reconsideration

- Provider must appeal within 60 days
- MAC/CMS has 90 days to process
   Providers can send a Reconsideration and a CAP together, but if we accept the CAP, we void the
   Reconsideration
- **3** Administrative Law Judge
- **4** HHS Departmental Appeals Board
- 5 Federal District Court

- If denial/revocation overturned...
   Hearing officer sends letter to provider; directs
   MAC to reinstate them.
- If denial/revocation upheld...
   Hearing officer sends letter to provider;
   provider can accept or appeal further.

## Noncompliance

# **Adverse Event**

**Provider's** medical license was suspended by the State licensing authority and the provider failed to report this adverse action to CMS within the required timeframe.

(Reporting Periods by Regulation citation: 42 CFR §424.516)

# **CMS Action**

CMS Subsequently **revoked** this providers Medicare billing privileges for:

## **Noncompliance**

as the provider did not hold a valid medical license

(CAP and Reconsideration Appeal Rights Apply)

## **Failure to Report**

as the provider did not report the medical license suspension to the MAC

(Reconsideration Appeal Rights Apply)

# False or Misleading Information

# **Adverse Event**

**Provider** submitted an 855 application, listing John Doe as its managing employee and reported no prior adverse actions.

**John Doe** was convicted of a healthcare fraud felony offense eight years prior to the submission of the application.

**CMS** detects the felony conviction after the enrollment was approved through ongoing provider screening.

# **CMS Action**

CMS Subsequently **revoked** this providers Medicare billing privileges for:

## **False or Misleading Information**

as the provider omitted the managing employee's felony conviction on its revalidation application.

(Reconsideration Appeal Rights Apply)

## **Felony Conviction**

as the managing employee has a felony conviction within the last 10 years (Reconsideration Appeal Rights Apply)

**CMS** notifies the **State Medicaid Agencies** (SMA) to terminate the provider after the Medicare appeal is complete.

# Non-Operational (Onsite Visit)

# **Adverse Event**

**Provider** initially enrolled with 123 Healthcare Lane, Anytown, DC 98765 reported as their practice location

**Provider** relocated their practice location to 456 New Site Drive, Anytown, DC 98765

**Provider** failed to report their change of practice location within the required timeframe

(Reporting Periods by Regulation citation: 42 CFR §424.516)

# **CMS Action**

CMS Subsequently **revoked** this providers Medicare billing privileges for:

## **Non-Operational**

as the provider was no longer operational at the address listed on its 855 application (Reconsideration Appeal Rights Apply)

## **Failure to Report**

as the provider did not report the change in practice location to the MAC (Reconsideration Appeal Rights Apply)

**CMS** notifies the **State Medicaid Agencies** (SMA) to terminate the provider after the Medicare appeal is complete.

## **Medicaid Terminations**

- If Medicare revokes "for-cause" then the states must terminate a provider from their program
- If one state terminates "for-cause" then all states must terminate a provider from their program
- If terminated from any state "for-cause", CMS has the discretion to revoke from Medicare

#### Scenario #1

- A provider is terminated for cause from California Medicaid
- The provider wants to enroll in Oregon Medicaid
- Provider cannot enroll in Oregon's Medicaid program because he is prohibited from enrolling in another state's Medicaid program while actively terminated in California.

#### Scenario #2

- A provider is revoked for cause from Medicare
- The provider would like to enroll in New Mexico Medicaid
- ➤ When a provider is revoked for cause from Medicare in any jurisdiction, the provider is unable to enroll in any state Medicaid program. Provider would not be permitted to enroll in New Mexico's Medicaid program.

#### Scenario #3

- A provider is terminated for cause from Arizona Medicaid
- The provider is also enrolled in Texas
- When a provider is terminated for-cause from a state Medicaid program, ALL other State Medicaid programs MUST also terminate the provider. Here Texas must terminate this provider. If the provider is also enrolled in Medicare, CMS has the discretion to revoke.

## Resources

#### cms.gov

- ordering and referring, DMEPOS accreditation, supplier standards
- 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

888-734-6433

PECOS Help Desk

#### ProviderEnrollment@cms.hhs.gov

**Provider Enrollment contact** 

#### FFSProviderRelations@cms.hhs.gov

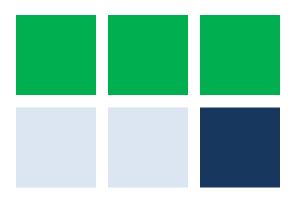
"ListServ" sign-up: Notice of program and policy details, press releases, events, educational material

#### cms.gov/EHRIncentivePrograms

Electronic Health Record website

#### cms.gov MLN Matters® Articles

articles on the latest changes to the Medicare Program



# Thank you

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If you need more accessibility options for the material, contact providerenrollment@cms.hhs.gov

**Centers for Medicare & Medicaid Services**