



Part D Prescriber Enrollment Requirements



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September 10, 2015

Requirement

Beginning June 1, 2016, in order for beneficiary prescriptions to be coverable under Part D, physicians, dentists and other eligible professionals who write prescriptions for Part D drugs must:

- Be enrolled in Medicare in an approved status or
- Be validly opted out of Medicare

Background

- The requirement is an important additional tool for CMS' efforts to promote quality and combat Part D fraud and abuse in the Medicare program.
 - **In the Part D program, there have been reports of**
 - Unqualified physicians prescribing covered Part D drugs, such as physicians with suspended licenses
 - Physicians prescribing inordinate amounts of Part D drugs
- The enrollment process allows CMS to verify prescribers' credentials.

Part D Prescriber Enrollment Requirement

Two pertinent regulations:

- CMS-4159-F, “Medicare Program; Contract Year 2015 Policy and Technical Changes to the Medicare Advantage and the Medicare Prescription Drug Benefit Programs” finalized on May 23, 2014
- CMS-6107-IFC, “Medicare Program; Changes to the Requirements for Part D Prescribers,” published on May 6, 2015

Exceptions

- The IFC exempts “other authorized prescribers” from the enrollment/opt-out requirement.
- The IFC requires Part D sponsors to first cover a “provisional supply” of three months before denying future claims for a Part D drug on the basis that the prescriber is not enrolled or opted out.
- Both exceptions are designed to provide continuity of care for Medicare Part D beneficiaries.
- Prescribers must still have an active and valid individual NPI for a prescription from an “other authorized prescriber” or a “provisional supply” to be covered.

“Other Authorized Prescribers”

- An “other authorized prescriber” is defined in the IFC as “an individual other than a physician (as defined in section 1861(r) of the Act) or eligible professional (as defined in section 1848(k)(3)(B) of the Act) who is authorized under State or other applicable law to write prescriptions.”

“Other Authorized Prescribers” (Cont.)

Example:

- In many states, pharmacists are allowed to write or modify certain prescriptions in certain circumstances.
- However, the Medicare statute does not include pharmacists among the types of eligible professionals who can enroll in Medicare or opt out.
- The exception means that Part D beneficiaries will continue to receive coverage for prescriptions written by pharmacists as allowed by state law without enrolling or opting out.

“Other Authorized Prescribers” (Cont.)

- **CMS has posted a Medicare Provider Enrollment Eligibility Reference Table. Thus far, pharmacists and naturopaths are the only providers identified as not eligible to enroll but may be eligible to prescribe under state law.**

Provisional Supply

- **The IFC requires Part D sponsors to first cover a “provisional supply” of 3 months before denying future claims for a Part D drug on the basis that the prescriber is not enrolled or opted out.**
 - Subject to all other Part D rules and plan coverage requirements
 - As prescribed by the prescriber
 - If allowed by applicable law
- **Individualized written notice to the beneficiary is also required on a per drug per prescriber basis.**
 - Within 3 business days after adjudication of the claim or request
 - In a form and manner specified by CMS
- **Reasonable efforts must be made by the Part D plan to also notify the prescriber.**

Provisional Supply (Cont.)

- The provisional supply requirement is intended to provide enough time for the prescriber to become enrolled.
- The provisional supply requirement also applies when a provider is disenrolled so that the beneficiary has time to find another prescriber to continue Part D coverage.

Guidance

- CMS has issued multiple guidance documents since the publication of the IFC:
 - June 1, 2015 – Medicare Part D Prescriber Enrollment Requirement Update
 - Enforcement delayed until June 1, 2016.
 - Part D sponsors strongly encouraged to begin conducting prescriber outreach no later than January 1, 2016, in accordance with the parameters in the memo.
 - *CMS provided draft sample prescriber outreach communication to stakeholder associations to review on July 31, 2015, and is reviewing comments.
 - Enrollee outreach no earlier than April 1, 2016, and dependent upon prescriber enrollment trends and further analysis of potential effectiveness. CMS to provide future guidance by 4th quarter 2015.

Guidance (Cont.)

- June 9, 2015 – Provider Enrollment, Chain and Ownership System (PECOS) and Updates to the Prescription Drug Event (PDE) File Layout and Edits:
 - Describes how the prescription drug event (PDE) file layout and edits will be updated to incorporate the use of the Provider Enrollment, Chain, and Ownership System (PECOS) in prescriber identifier editing.
 - Beginning June 1, 2016, the PDE file layout will include two new fields; 1) “Type of Fill” and 2) “non-PECOS NPI Indicator.”

Guidance (Cont.)

- June 10, 2015 – Requirements for Part D Coverage: Prescriber Requirements
 - **Requests that organizations offering Part D prescription drug coverage in conjunction with other Medicare coverage confirm their contracting providers are eligible to furnish Part D prescriptions**
 - **Notes that:**
 - Medicare payment cannot be made directly or indirectly for services furnished by an opt-out physician, except for certain emergency and urgent care services
 - Medicare Advantage Plans cannot contract with or pay an opt-out provider, except for certain emergency or urgent care services
 - Providers under contract with a Medicare Advantage plan must enroll in order for their prescriptions to be coverable under Part D

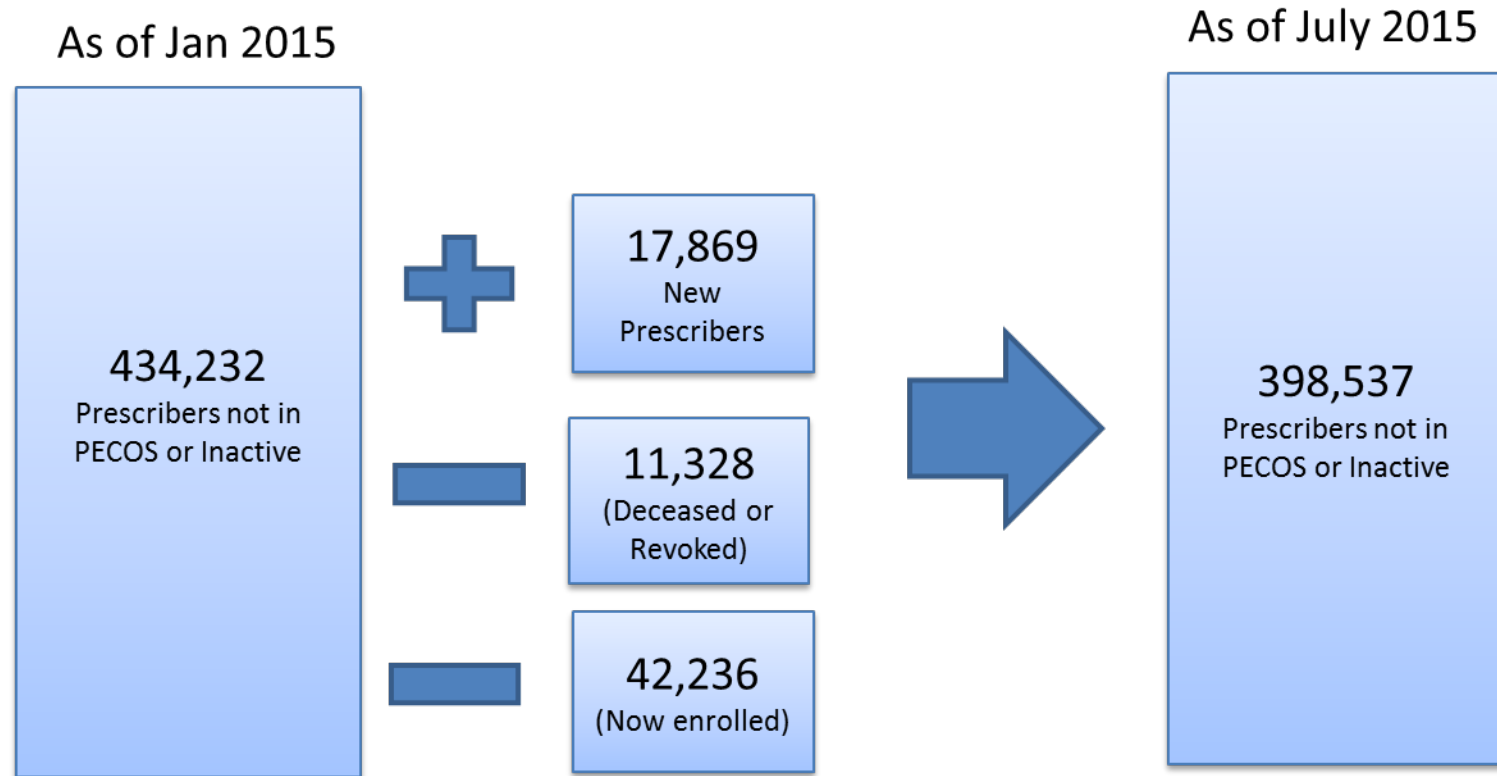
Further Guidance/Websites

- CMS expects to issue the final sample prescriber outreach letter and guidance on “Other Authorized Prescribers” and provisional supply in the near future.
- Information for Part D sponsors and PBMs (including the guidance and other documents) is available at:
<https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovGenIn/Prescriber-Enrollment-Information.html>
- Information for providers is located at:
<https://www.cms.gov/PrescriberEnrollment>

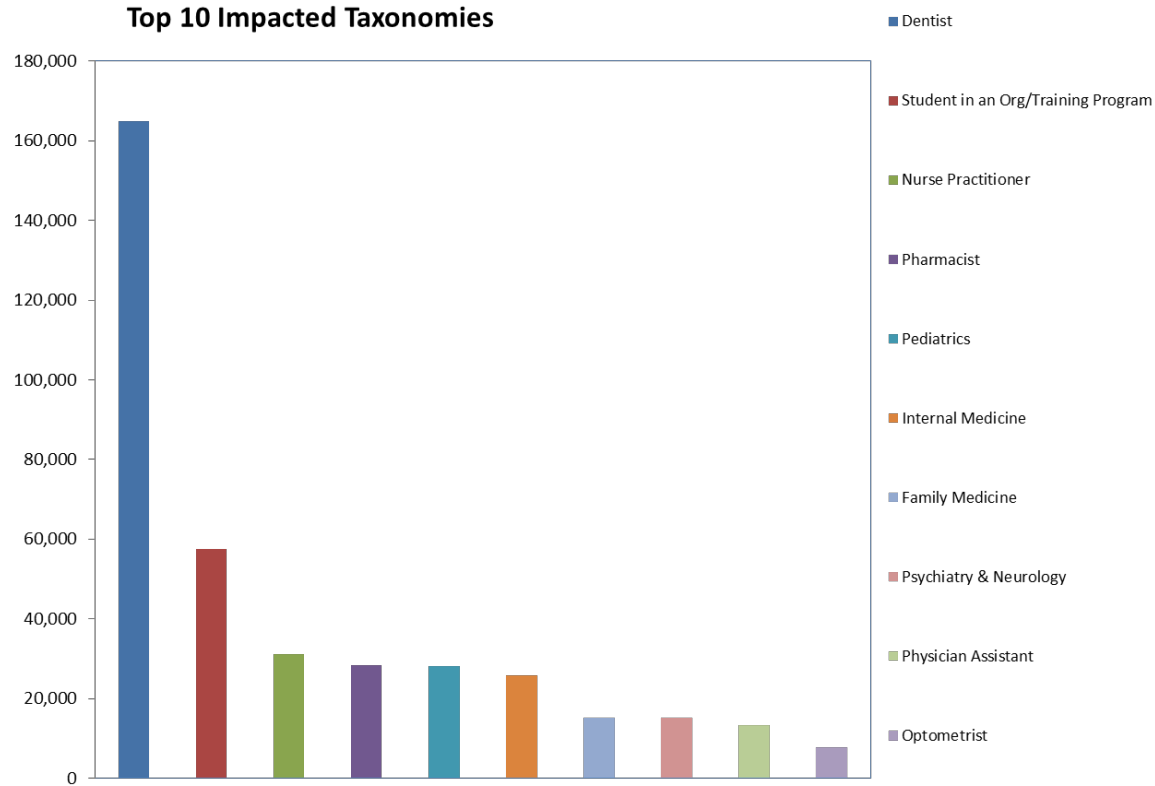
Monitoring Progress

- Minimal enrollee impact is essential to the success of the prescriber enrollment initiative
- Monitor and track the percentage of enrolled prescribers to assess the impact of enforcement on prescribers and enrollees
- Target outreach to those remaining prescribers

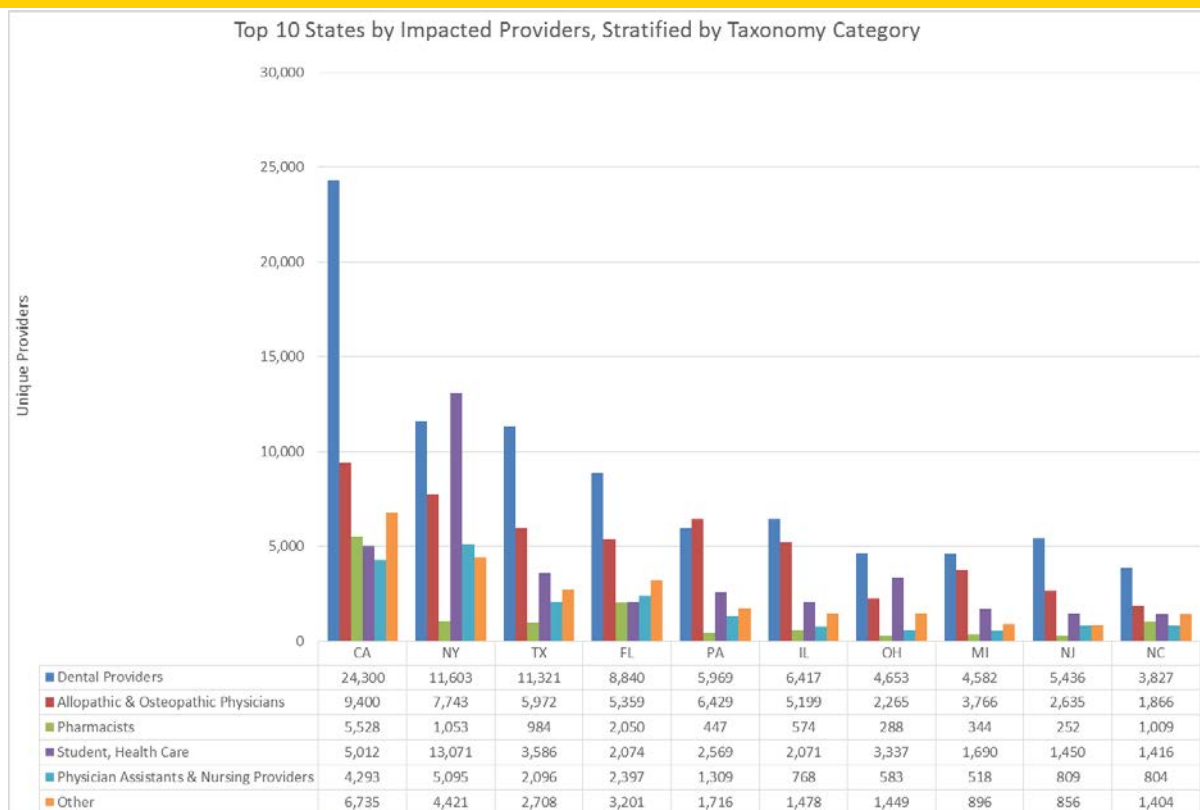
Monitoring Progress (Cont.)



Monitoring Progress (Cont.)



Monitoring Progress (Cont.)



Outreach Strategies

- Analyze and understand market:
 - Stratify and segment the groups of unenrolled prescribers by PDEs, specialty and geographic location
 - Convene multiple key stakeholder groups to establish networks, coordination and information sharing
- Plan and design engagement strategy:
 - Redesign the prescriber enrollment website (plain language, clear call to action and state the consequences of non-compliance)
 - Target largest PDE non-compliant specialties with rule awareness messaging early on, evolving to deadline-driven, urgent messaging

Outreach Strategies (Cont.)

- Engage the market:
 - Partner with prescriber organizations to enhance reach and capacity
 - Target top prescribers with personalized outreach (phone and email)
 - Develop and disseminate outreach resources to inform and guide prescribers to successful enrollment

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Prescriber Enrollment Information

ATTENTION: This applies to you if you are a physician or other eligible professional who writes prescriptions for Part D drugs for Medicare beneficiaries.

The Centers for Medicare & Medicaid Services (CMS) finalized CMS-4159-F, Medicare Program; Contract Year 2015 Policy and Technical Changes to the Medicare Advantage and the Medicare Prescription Drug Benefit Programs on May 23, 2014. This rule requires physicians and, when applicable, other eligible professionals who write prescriptions for Part D drugs to:

- be enrolled in Medicare in an approved status, or
- have a valid opt-out affidavit on file for their prescriptions to be covered under Part D.

The final regulation stated that the effective date for this requirement would be June 1, 2015. However, CMS is announcing that it will delay enforcement until December 1, 2015 of the requirements in 42 CFR § 423.120(c)(6).

Nevertheless, prescribers of Part D drugs should submit their Medicare enrollment applications or opt-out affidavits to their Medicare Administrative Contractors (MACs) by June 1, 2015, or earlier, to ensure that MACs have sufficient time to process the applications or opt out affidavits and avoid their patients' prescription drug claims from being denied by their Part D plans beginning December 1, 2015.

In an effort to prepare the prescribers and Part D sponsors for the December 1, 2015, enforcement date, CMS is making available an enrollment file that identifies physician and eligible professional who are enrolled in Medicare in an approved or opt out status. The first iteration of the enrollment file is now available at <https://data.cms.gov/dataset/Medicare-Individual-Provider-List/u8u9-2upx>. The file contains production data but is

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Any physician or other eligible professional who prescribes Part D drugs must either enroll in the Medicare program or opt out in order to prescribe drugs to their patients with Part D prescription drug benefit plans. Medicare Part D may no longer cover drugs that are prescribed by physicians or other eligible professionals who are neither validly enrolled, nor opted out of Medicare. All prescribers should enroll before January 1, 2016 to allow for the processing of applications and to ensure enrollees get their prescriptions.

Medicare Administrative Contractors (MACs) are here to help. [Locate the MAC that services your geographic area.](#)



Check Your Enrollment Status

Start by verifying that your application has been submitted and is awaiting processing:

- [physician list](#)
- [non-physician list](#)

Check the [enrollment file](#) on the CMS website to confirm your enrollment status in the Medicare program. Checking your status is easy; follow these [simple steps](#).



Enroll to Prescribe

- **Enroll online:** Use [PECOS, the online application](#), to fast-track your enrollment. Our [how-to guide](#) is here to help.

OR

- **Enroll offline:** You may mail in your [paper application](#) instead.

To learn more, visit our [How to Enroll page](#).



Learn more about Prescriber Enrollment

Learn about the [latest changes to our regulations](#) and how it may impact you and your patients. Check the [About page](#) for a comprehensive list of resources, including [FAQs](#) and the [Program Integrity Manual \(PIM\)](#).

Pharmacists

Please read this [important information concerning your enrollment requirements](#).

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Outreach Tactics – Digital Advertising

**NEW
PART D RX
RULE STILL
IMPACTS
YOU**



Prescriber Viewed Websites

Digital B2B media companies that deliver industry news to targeted stakeholders.

**DENTISTS:
MAKE SURE
YOUR PATIENTS
ARE COVERED**

Professional Specialist Organizations

Organizations seeking to further a particular profession, the interests of individuals engaged in that profession and the public interest.

**MEDICARE
ENROLLMENT
REQUIRED TO RX**



GET STARTED

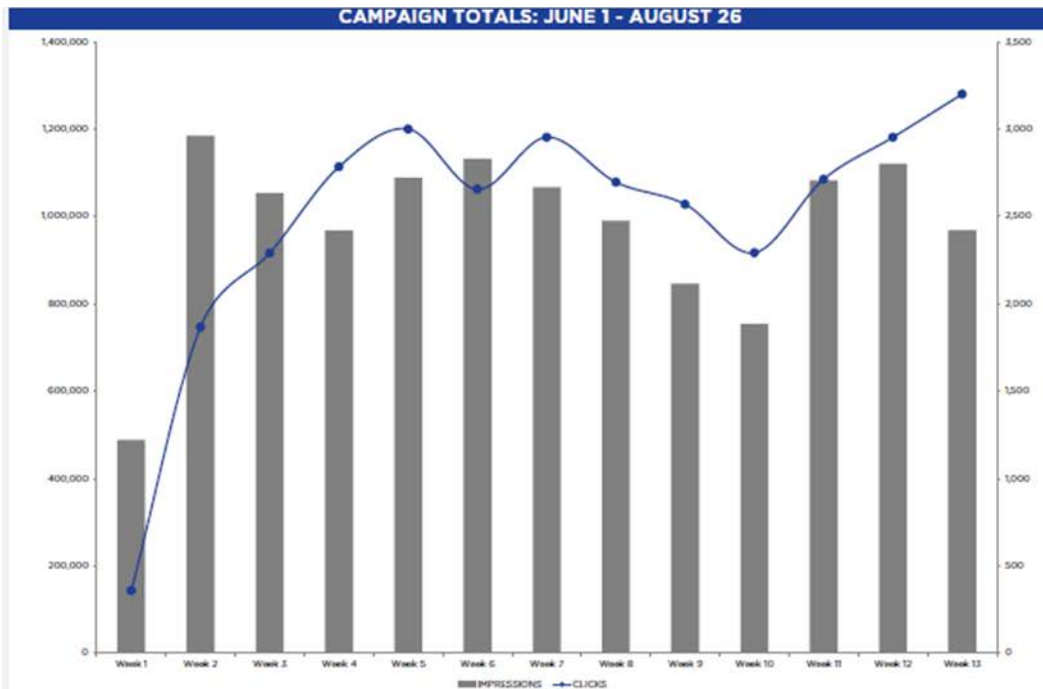
ENROLL IF YOU RX

Google Search

Advertising service to display ads on Google and its advertising network.

Outreach Tactics – Digital Advertising (Cont.)

Results as of August 26, 2015



- **12M+ Ad Impressions**
- **28,197 Visits to Part D page from ads**
 - 1,945 Visits to PECOS from ads
 - 290 downloads of 8550 from ads

Outreach Tactics – Specialty Events

Stakeholder Meetings:

- ADA, ABGD, ACD, AAOMS, AGD, AAE, PCMA, AMA, AAMC, MGMA, NCPDP, AARP

Conferences:

- AGD Academy of General Dentistry 2015 Annual Meeting
- ADA 2015 America's Dental Meeting
- Greater NY Dental Meeting 2015
- AAPA Conference 2016
- AANP 2016 Health Policy Conference
- AANP 2016 National Conference
- NDA Convention 2016
- AACP 2016 Annual Meeting
- 2016 ADEA Annual Session & Exhibition

Outreach Tactics – General Marketing

Email Marketing:

- Targeted email campaigns to unenrolled prescribers
- Medscape Outreach – email messaging to specialty groups

Direct Mail:

- Drafted a sample letter for health plans to use for prescriber enrollment outreach

Customer Service Scripts:

- Updated customer service representatives' scripts at 1-800-Medicare; Medicare & You handbook

Outreach Tactics – Social Media

Social Media Listening:

- Learn qualitative information about our target market, including:
 - The sentiment around Part D Prescriber Enrollment
 - What pain points or misconceptions
 - What information or products our stakeholders are looking for
 - What solutions can we provide to resolve their problems
- Current Findings:
 - General belief that the enrollment process is overly complex and too time consuming
 - Results in some prescribers pay middle men to execute at a cost

Outreach Resources

- [PECOS Video Tutorial](#)
- [Enroll to Prescribe How-To Guide](#)
- [Enrollment File on data.cms.gov](#)
- [Part D Prescriber Enrollment Website](#)
- [Part D Prescriber Enrollment MAC List](#)
- [ProviderEnrollment@cms.hhs.gov](#)
- [PartDpolicy@cms.hhs.gov](#)

Outreach – Going Forward

- Utilize CMEs to entice more prescribers to successfully enroll in Medicare
- Target top prescribers with personalized outreach (phone and email); Maintain communication to ensure enrollment
- Create toolkit for Regional Offices pitching (info for state medical orgs, licensing boards and media)
- Capitalize on other initiatives (e.g., E-prescribing - send prescribers auto response message for reminder)
- Enrollment help walk through webinar with Q&A

Questions

