

# **Provider Enrollment Revalidation Cycle 2**

#### **Summary:**

The Centers for Medicare & Medicaid Services (CMS) initiated Cycle 2 revalidations in March 2016. Novitas Solutions, Inc. (Novitas) issued the first set of revalidation notification letters, via hardcopy, on March 18, 2016.

# **Background**

Section 6401 (a) of the Affordable Care Act established a requirement for all enrolled providers/suppliers to revalidate their Medicare enrollment information under new enrollment screening criteria. CMS has completed its initial round of revalidations and is resuming regular revalidation cycles in accordance with 42 CFR §424.515. This cycle of revalidation applies to those providers/suppliers that are currently and actively enrolled.

# **Key Points**

Providers/suppliers are required to revalidate their entire Medicare enrollment record. This means <u>all</u> information in the enrollment record, including all assigned National Provider Identifiers (NPIs) and Provider Transaction Access Numbers (PTANs), is being revalidated. Individual providers who reassign benefits to more than one group or entity must include all organizations to which benefits are reassigned on one revalidation application. If someone is completing the application on behalf of an individual provider, that person is strongly encouraged to coordinate with all groups/entities to ensure all reassignments remain intact.

The processing status of Cycle 2 revalidation applications can be obtained utilizing the Provider Enrollment Status Inquiry Tool located on Novitas' website (www.novitas-solutions.com).

In an effort to streamline the revalidation process, CMS has implemented the following revalidation processing changes for the upcoming cycle:

- Requests for application submission extensions will not be granted. Failure to submit a revalidation application will result in a hold on Medicare payments and subsequent deactivation if the application is ultimately not submitted (see later bullet for additional information).
- Due dates are being established by which the provider/supplier's revalidation application must reach their Medicare Administrative Contractor (MAC) in order to remain in compliance with Medicare's provider enrollment requirements. The due dates will typically be the last day of a month (e.g., June 30, July 31 or August 31) and are established based on the date of the provider/supplier's last successful revalidation or initial enrollment (approximately three years for Durable Medical Equipment [DME] suppliers and five years for all other

- providers/suppliers). Generally, the established due date will remain with the provider/supplier throughout subsequent revalidation cycles.
- Revalidation notifications will be issued well in advance of the due date (i.e., two to three months). Novitas will issue hardcopy notifications to at least two addresses on file (correspondence, special payments and/or primary practice location). The notification will be sent in a yellow envelope and will include the established due date. Notifications issued to providers who reassign benefits (group members) will list the identifying information of the organization(s) to which the individual reassigns benefits.
  - Providers/suppliers who are within two months of their listed due date, but have not received a notification to revalidate, are encouraged to submit their revalidation application.
  - Large groups (200+ members) accepting reassigned benefits from providers/suppliers identified on the CMS list will receive a letter listing the providers linked to their group that are required to revalidate for the upcoming six month period. A spreadsheet will be provided detailing the applicable provider's information (name, NPI, specialty, etc.). Novitas will have dedicated provider enrollment staff to assist with large group revalidations.
- Providers/suppliers enrolled solely to order, certify and/or prescribe via the CMS-8550 application, or those who have opted out of Medicare, will not be asked to revalidate.
- CMS has provided a "Revalidation Due Date Lookup Tool." This tool includes all enrolled providers/suppliers. A due date will display for those providers/suppliers due for revalidation. The display for providers/suppliers not yet due for revalidation will reflect "TBD" (To Be Determined). A crosswalk to the organization to which an individual provider reassigns benefits is also available. Providers/suppliers should utilize this tool to determine if a revalidation application is due. The due dates will be posted up to six months before the revalidation due date. The tool will be updated periodically to ensure the most current data is provided.
- An application will be considered "unsolicited" if it is submitted but the provider/supplier is not due for revalidation in the current six month period. If the provider/supplier does not have a due date established (i.e., "TBD"), a revalidation application should not be submitted. All unsolicited revalidation applications will be returned by the MAC.
  - If the provider/supplier wishes to submit a change to their enrollment information, the application must clearly indicate the submission is for a "change of information" to avoid the application being returned.
- Providers/suppliers must submit a complete revalidation application by the established due date
  and respond to all requests for additional information issued by Novitas in a timely manner.
  Again, no extensions for application submission will be granted. Failure to submit a
  revalidation application will result in a hold on Medicare payments and subsequent
  deactivation if the application is ultimately not submitted. If the revalidation application is

- received, but additional information is requested and not received within 30 days of the request, Medicare billing privileges will be deactivated.
- In order to reestablish Medicare billing privileges subsequent to deactivation, the provider/supplier is required to submit a new, fully completed application. The provider supplier will maintain their original PTAN; however, an interruption in billing will occur during the period of deactivation resulting in a gap in coverage.
  - The reactivation date after a period of deactivation will be based on the receipt date of the new, fully completed application. Retroactive billing privileges during the period of deactivation will <u>not</u> be granted. Services provided to Medicare patients during the period between deactivation and reactivation are the provider's liability.
- Novitas encourages providers/suppliers to utilize Internet-based PECOS (PECOS Web) to submit their revalidation application. This is the fastest and most efficient method for submission of revalidations since it allows the provider/supplier to review all information currently on file on one screen utilizing the "fast-track view." If changes are required, the individual "topic" may be selected from the fast-track view, changes can be made quickly and easily and the submission process begins by the click of a button. If no changes are required, the provider/supplier simply clicks the button to begin submission. The application may be electronically signed and all supporting documentation can be digitally uploaded.
  - o Providers/suppliers can review the revalidation status in their enrollment record utilizing PECOS Web to determine if a revalidation due date has been established.
  - o To use PECOS Web, approval to access the system through the Identity and Access Management System, commonly referred to as "I&A," is required.
- The Medicare provider enrollment revalidation effort does not change other aspects of the enrollment process. Providers/suppliers should continue to submit changes (for example, changes of ownership, change in practice location or reassignments, final adverse action, etc.) as they always have. If you also receive a request for revalidation, respond separately to that request.
- Applications submitted in conjunction with the revalidation effort must indicate the reason for submission is "revalidation."

#### **Outreach and Education**

CMS and Novitas will be conducting outreach and education efforts specific to the Cycle 2 revalidation process. CMS has issued a MLN Matters Article (SE1605) and has a revalidation page on their website dedicated to revalidation. Novitas will work closely with our Provider Outreach and Education department to include Cycle 2 information in upcoming presentations and our Enrollment Center on our website also has a wealth of information related to revalidation. We will also work directly with large groups and professional associations on revalidation requirements.

#### Resources

Provider Enrollment Status Inquiry Tool:

- Jurisdiction L <a href="http://www.novitas-solutions.com/webcenter/content/conn/UCM\_Repository/uuid/dDocName:00004864?proto=http-www.novitas-solutions.com/space=MedicareJL">http://www.novitas-solutions.com/uCM\_Repository/uuid/dDocName:00004864?proto=http-www.novitas-solutions.com/space=MedicareJL</a>
- Jurisdiction H <a href="http://www.novitas-solutions.com/webcenter/content/conn/UCM\_Repository/uuid/dDocName:00004864?proto=http-www.novitas-solutions.com/space=MedicareJH">http://www.novitas-solutions.com/webcenter/content/conn/UCM\_Repository/uuid/dDocName:00004864?proto=http-www.novitas-solutions.com/space=MedicareJH</a>

MLN Matters Article SE1605: <a href="https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/Downloads/SE1605.pdf">https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/Downloads/SE1605.pdf</a>

Revalidation Due Date Lookup Tool: <a href="http://go.cms.gov/MedicareRevalidation">http://go.cms.gov/MedicareRevalidation</a>

Internet-based PECOS (PECOS Web): <a href="https://pecos.cms.hhs.gov/pecos/login.do">https://pecos.cms.hhs.gov/pecos/login.do</a>

Identity and Access Management System (I&A): <a href="https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/MedEnroll PECOS PhysNonPhys FactSheet ICN903764.pdf">https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/MedEnroll PECOS PhysNonPhys FactSheet ICN903764.pdf</a>

Provider Enrollment Help Line: JL 1-877-235-8073; JH 1-855-252-8782

Novitas Website: www.novitas-solutions.com

March 1, 2016 MLN National Provider Call (Provider Enrollment Revalidation) Material: https://www.cms.gov/Outreach-and-Education/Outreach/NPC/National-Provider-Calls-and-Events.html

CMS Website: <a href="https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/MedicareProviderSupEnroll/Revalidations.html">https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/MedicareProviderSupEnroll/Revalidations.html</a>