



PALMETTO GBA®
A CELERIAN GROUP COMPANY

Enrollment Quick Takes

Provider/Supplier Reporting of Adverse Legal Actions

You are required to report adverse legal actions in sections 7, 8b and 9b of the 855S application. If you are using PECOS you will report in topics Final Adverse Legal Actions, Organization Control, and Individual Control. This includes any records that were expunged or any appeals are pending. Failure to complete these sections or omitting information when submitting applications or revalidations will result in a denial or revocation of your application.

Historically, CMS deemed Medicare Payment Suspensions and CMS-Imposed Medicare Revocations to be reportable Final Adverse Actions. In an effort to reduce provider and supplier burden, **CMS NO LONGER** requires Medicare Payment Suspensions and CMS-Imposed Medicare Revocations to be reported.

The updated list of reportable Final Adverse Actions is as follows:

- Felony and Misdemeanor conviction(s) within 10 years
- Current or Past Suspension(s)/Revocation(s) of a medical license a stated in the application
- Current or Past Suspension(s)/Revocation(s) of an accreditation
- Current or Past Suspension(s) or Exclusion(s) imposed by the U.S. Department of Health and Human Service's Office of Inspector General (OIG)
- Current or Past Debarment(s) from participation in any Federal Executive Branch procurement or non-procurement program
- Medicaid exclusion(s), revocation(s), or termination(s) of any billing number
- Any other Current or Past Federal Sanction(s)

Please note that documentation concerning the final adverse action must be furnished regardless of whether the adverse action occurred in a state different from that in which the provider/supplier seeks enrollment or is enrolled.

Correspondence Address and billing agencies

As per the Program Integrity Manual (PIM) section 15.5.2.2 the correspondence address cannot be the address of a billing agency, management services organization, chain home office, or the provider's representative (e.g., attorney, financial advisor). It can, however, be a P.O. Box or, in the case of an individual practitioner, the person's home address. Submission of one of these invalid addresses on your application will result in a processing delay.

Top Reasons for Development of Enrollment Applications

Imagine pulling up the [NSC Application Status Tool](#), and to your surprise, your application is complete. During the application process you didn't receive any correspondence from the NSC. Your application processed as "clean". Clean applications require no request for development. This is the goal for all applications that NSC receives. Over the past quarter the NSC processed 7,250 applications, and almost 50% of all applications and 25% of revalidations have required development. The 5 most common reasons for development are:

- Fee payment
- Insurance
- License
- Section 9
- Section 15

Fee Payment

If you are submitting an application for a new enrollment, revalidation, additional location, or reactivation a fee payment is required. The fee payment for 2018 is \$569. This includes physicians, there are no fee exemptions.

Insurance

The general liability insurance we have on file has to be your most recent general liability insurance. You need to submit a current copy of your current certificate of insurance when submitting any updates to your file.

License

Verify if the NSC requires a license from you by visiting our [licensure database](#). You are required to submit all applicable licenses to process your application.

Ownership Interest and/or Managing Control Information (Individuals)

Often we receive applications that are signed by a new authorized or delegated official and Section 9 of the 855s or Individual Control in PECOS is blank. There must be at least one managing employee for each application. Note: a single person can hold multiple roles within the company.

Authorized Official Certification Statement and Signature

Every application submitted to the NSC must be signed before being processed. Whenever you are adding a new owner, partner, officer, director, delegated official, managing employee, authorized official, or any changes to your application a signed section 15 is required.

Revalidation Reminders

- Check for your revalidation due date at CMS's [Medicare Revalidation List](#).
- Medicare Enrollment Fees are required for all submissions of revalidation applications.
- List the Provider Transaction Access Number (PTAN) for which you are revalidating in section 1B. In PECOS ensure you choose the correct PTAN in the revalidation center.
- Be certain that the revalidation letter you received pertains to your DMEPOS PTAN and not for a part B enrollment.
- List all authorized and delegated officials for the organization, as well as the managing employee for the location.
- Complete all sections of the application.

★ Supplier Standard Reminder ★

Standard #4: (42 CFR 424.57c) A supplier must fill orders, fabricate, or fit items from its own inventory, or contract with other companies for the purchase of items necessary to fill orders. If it does, it must provide, upon request, copies of contracts or other documentation showing compliance with this standard. A supplier may not contract with any entity that is currently excluded from the Medicare program, any State health care programs, or any other Federal procurement or non-procurement programs or activity.

Tax-id number Change and NPI's

Suppliers who are changing their tax-id number (TIN) to a new TIN and keeping the same NPI, may not submit any additional claims associated with the previous TIN. Suppliers should ensure they have submitted all of their claims associated with the old TIN before updating their NPI to the new TIN. Alternatively, suppliers can obtain a new NPI for the new TIN.

Note: TIN changes do not require a fee to be paid when the existing TIN has an active PTAN associated with it.

Refunds, Refunds, Refunds

If you have made a payment to the NSC on an application and need to request a refund, you must request your refund no later than 150 days from the date of the submission of your application. The request must include the following information. For credit card refunds, the provider shall include its Pay.gov receipt or the Pay.gov tracking ID number; if the fee was paid via ACH Debit, a W-9 is required.

Did You Know?

NSC Web Form Submission Tool

The NSC accepts forms of documentation and updates via the NSC's website that do NOT require the submission of the CMS 855S application. Using the NSC Web Form Submission page you can submit:

- Licenses
- Supplier Audit and Compliance Unit (SACU) Supplier Responses
- Standalone Certificates of Insurance
- NPI Letters
- Surety Bonds
- Appeals (For revoked suppliers only)

These documents may be submitted unsolicited to the NSC and processed without having to submit an 855S application.

You can only submit documentation if you have a PTAN (active or revoked). Documents should be submitted in PDF format. Complete all required fields as noted by the red asterisks. **Please include a current copy of your liability insurance certificate with each submission.** (Failure to have current insurance on file will result in a request for the certificate of liability and delay processing of your request)

NSC Application Status Tool

Don't want to pick up the phone and call the NSC to get a status of an application? No problem. You can just pull up the NSC Application Status Tool on-line and check the status of your reactivation, revalidation, or change of information. You can even get the status of new applications and additional locations.

Last quarter the NSC Application Status Tool had 58,386 uses.

Visit: https://www4.palmettogba.com/ecx_nscast/

Surety Bond

If your surety bond with the NSC has lapsed, you are subject to revocation. The surety company sends the NSC notifications of lapses of coverage. They **rarely** send notifications of reinstatements of coverage. It is your responsibility to ensure we have received any reinstatement correspondence. Please ensure your surety bond is current. If you have a new bond or your bond has been reinstated, please notify the NSC within 30 days of the bond issuance to avoid being revoked. You can easily submit the new bonds or reinstatements using the NSC Web Form Submission tool.

PECOS

Increasingly, DMEPOS Suppliers are recognizing the benefits of using Internet-based PECOS (Provider Enrollment, Chain and Ownership System) to submit enrollment information to the National Supplier Clearinghouse. DMEPOS suppliers can use Internet-based PECOS to enroll, revalidate, make a change in their enrollment record, view their Medicare enrollment information on file with Medicare and check on the status of a Medicare enrollment application via the internet.

Did you know?

- Since its Fall 2010 implementation, Internet-based PECOS has undergone several phases that improved functionality for users
- Revalidations and changes of information are easier to complete because PECOS is pre-populated with the enrollment information already on file
- You can upload your supporting documentation and e-Sign via Internet-based PECOS making your submission completely electronic
- Submission through internet-based PECOS decreases development requests and requests for additional information for incomplete applications ultimately, accelerating the enrollment process
- Submitting information through Internet-based PECOS can significantly reduce the application completion time for you

Give Internet-based PECOS a try!

Log onto the CMS Website or Register to become a new user at: <https://pecos.cms.hhs.gov/pecos/login.do>

Go to our website for additional information and CMS Resources: <http://www.palmettogba.com/nsc> or

<https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNGenInfo/Index.html>

Ask Wendell

Q. I recently purchased a DMEPOS company that was already accredited. With the change of ownership, is my business still accredited?

A. Accreditation does not transfer with the acquisition of a DMEPOS business. If the old owner had accreditation, the new owner could be enrolled as of the date of sale however, current accreditation must be in place. Suppliers are responsible for contacting the accrediting organization within 30 days of the acquisition for further instruction and guidance.

Q. Must all physical locations be enrolled individually?

A. The supplier must enroll separate physical locations it uses to furnish Medicare-covered DMEPOS with the exception of locations that it uses solely as warehouses or repair facilities.

NSC Listserv

Are you reading this Newsletter by means of your email inbox? Or have you had to pull up the NSC's website to obtain your copy?

Sign up for the **NSC Listserv** and get these benefits:

- Get notified of important updates for the NSC
- Have NSC newsletters delivered directly to your inbox
- Monthly reminders about NSC revalidations due
- Stay current on policies and procedures to maintain your active supplier status

You can sign up for the **NSC Listserv** at <https://www.palmettogba.com/listserv>

EFT Agreements

- **Required** with initial application or new location application only – all EFT information can be submitted via PECOS with your application
- **Required:** voided check, preprinted deposit slip or confirmation of account information on bank letterhead
- Changes to your EFT information should be submitted directly to your DME MAC using the CMS Form 588
- CMS Form 588 must have original signature of authorized or delegated official on file with the NSC
- CMS Form 588 can be located on [CMS Website](#)



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