

Part B Insider (Multispecialty) Coding Alert

ENROLLMENT: CMS Delays Ordering/Referring PECOS Regulation Until 2011

Take the extra time to get your practice registered in PECOS -- don't wait until the end of the year, CMS reps say.

Practices that were busily struggling to find out whether their ordering/referring physicians' national provider identifiers (NPIs) were in the PECOS system can relax a little bit -- at least until next year.

If your physician performs a service as the result of an order or referral, your claim must include the ordering or referring practitioner's NPI, and that number must be in the Medicare Provider Enrollment, Chain, and Ownership System (PECOS) or the payer's computer system.

Currently, if you submit claims for services or items ordered/referred and the ordering or referring physician's information is not in the MAC's claims system or in PECOS, your practice will get an informational message letting you know that the practitioner's information is missing from the system. But CMS was planning to start denying claims as of April 5 that lacked this information.

However, that date has been pushed back until Jan. 3, 2011, announced CMS's **Jim Bossenmeyer** during a Feb. 17 CMS Open Door Forum. Repeating the information twice because of its importance, Bossenmeyer said, "CR 6417 and CR 6421 have been delayed until January 3, 2011."

Don't waste the extra time: Although CMS offers some breathing room with the date extension, you shouldn't abandon your attempts to get your information into PECOS.

"The delay in implementing Phase 2 of these CRs will give physicians and non-physician practitioners who order items or services for Medicare beneficiaries or who refer Medicare beneficiaries to other Medicare providers or suppliers sufficient time to enroll in Medicare or take the action necessary to establish a current enrollment record in Medicare prior to Phase 2 implementation," the CMS Web site indicates.

If you are unsure of whether your information is in the PECOS system, you can check the file, which contains approximately 800,000 practitioner records, on the CMS Web site. For more on the delay, visit www.cms.hhs.gov/MedicareProviderSupEnroll/06_MedicareOrderingandReferring.asp.

Avoid PECOS Lags

Also on the call, Bossenmeyer indicated that the number one reason for delayed processing of paper Medicare enrollment applications (855-I or 855-B forms) is "incomplete applications or delays in the submission of developmental materials." CMS "strongly encourages" providers to use internet-based electronic PECOS, which is faster and results in fewer errors. Always remember to sign, date, and mail your certification statement and any supporting documentation, Bossenmeyer noted.

DMEPOS suppliers will not have internet-based PECOS availability until later this year, Bossenmeyer said.

Get New Docs Into PECOS

One caller noted that her practice hired a new physician who moved from Oregon to Wyoming, but was remaining with the same MAC with which he was previously enrolled, despite moving from one state to another. Even in this case, the new practice should complete a new PECOS application for the physician. "Medicare enrolls physicians and nonphysician practitioners, along with groups, by state, not by MAC jurisdiction," a CMS rep. noted on the call. "So if you're in Montana

and you're in Utah, you should be enrolling twice -- once for each state."