

HOW DOES THE CMS PECOS SYSTEM AFFECT DENTISTS AND ORAL SURGEONS?

Medicare Enrollment Guidance for Doctors Who Infrequently Receive Reimbursement from the Medicare Program

Traditionally, most doctors have enrolled in the Medicare program to furnish covered services to Medicare beneficiaries. However, with the implementation of Section 6405 of the Affordable Care Act, some doctors will need to enroll in the Medicare program for the sole purpose of certifying or ordering services for Medicare beneficiaries. These doctors do not send claims to a Medicare contractor for the services they furnish.

In the process of implementing the provisions contained in the Affordable Care Act, CMS has become aware of several unique enrollment issues for certain types of doctors and practitioners. Specifically, they have modified the process of enrollment to accommodate the special circumstances of the following individual doctors and practitioners:

- Doctors employed by the Department of Veterans Affairs
- Doctors employed by the Public Health Service
- Doctors employed by the Department of Defense Tricare program
- Doctors employed by Federally Qualified Health Centers (FQHCs), Rural Health Clinics (RHCs) or Critical Access Hospitals (CAHs)
- Doctors in a Fellowship
- Dentists, including oral surgeons

CMS has developed an abbreviated enrollment process and documents for the providers listed above. However, due to this being a unique solution to enrollment for a specific set of providers, their systems will not accommodate the abbreviated forms on-line. Therefore, any of the above providers who are not currently enrolled in PECOS, must use the paper enrollment application process and do the following:

- Complete the following sections of the paper CMS-855I, “Medicare Enrollment Application for Physicians and Non-Physician Practitioners;”
 - Section 1 – Basic Information (you would be a new enrollee)
 - Section 2 – Identifying Information (Section 2A, 2B, 2D and if appropriate 2H and 2K)
 - Section 3 – Final Adverse Actions/Convictions
 - Section 13 – Contact Person
 - Section 15 – Certification Statement (must be signed and dated – blue ink recommended)
- Include a cover letter with the application form stating the doctor is enrolling for the sole purpose of ordering and referring items or services for a Medicare beneficiary to another provider and suppliers and cannot be reimbursed for services performed, and

- Mail the completed form to your designated Medicare enrollment contractor.

In order to provide covered services to Medicare beneficiaries, a dentist, including oral surgeons, would need to complete the full enrollment application either on-line or complete a hard copy.

Note: In completing the enrollment application portion dealing with specialty, oral surgeons would check the “oral surgery (dentist only)” box found in Section 2 of the Medicare enrollment application. Any other dentist would check the box titled, “Undefined Physician Type” and specify that they are a dentist in the space provided. In the near future, CMS will revise the Medicare enrollment application to add “Dentist” as a physician specialty.

The original effective date for providers to be enrolled in the PECOS system was January 3, 2011. However, due to enrollment backlogs and other system issues, the edits will not be implemented on this date. CMS has stated that it will provide ample advance notice to the provider and beneficiary communities before they begin any automated nonpayment actions.

If you are unsure as to whether or not your practice and/or providers are enrolled in the PECOS system, you should take steps to do so as soon as possible. There are three ways to verify if your practice and/or providers have an existing enrollment record:

- 1) Check the Ordering Referring Report on the CMS website. If you are on that report, you have a current enrollment record in PECOS. Go to <http://www.cms.gov/MedicareProviderSupEnroll> and click on “Ordering Referring Report” on the left.
- 2) Use Internet-based PECOS to look for your PECOS enrollment record. If no record is displayed, you do not have an enrollment record in PECOS. Go to <http://www.cms.gov/MedicareProviderSupEnroll> and click on “Internet-based PECOS” on the left.
- 3) Contact your designated Medicare enrollment contractor and ask if you have an enrollment record in PECOS. Go to <http://www.cms.gov/MedicareProviderSupEnroll> and click on “Medicare Fee-For-Service Contact Information” under “Downloads”.

Note for physicians who reassign all their Medicare benefits to a group/clinic: *If you reassign all of your Medicare benefits to a group/clinic, the group/clinic must have an enrollment record in PECOS in order for you to enroll via the web. You should check with the officials of the group/clinic or with your designated Medicare enrollment contractor if you are not sure if the group/clinic has an enrollment record in PECOS. If the group/clinic does not have an enrollment record in PECOS, you will not be able to*

use the web to submit your enrollment application to Medicare. You will need to submit a paper application.

Tips on how to enroll in PECOS can be found at:

www.cms.hhs.gov/MedicareProviderSupEnroll on the CMS website.

If you would like to inquire about assistance with enrolling your practice and/or providers in the PECOS system, please contact Cheri Brown at 704-261-3161 or via email at cbrown@healthcaregmt.com.