
MEDICARE COMPLIANCE

Providers and suppliers must re-enroll in Medicare by March 2013 if they initially enrolled before March 25, 2011, according to an Aug. 10 CMS announcement. But CMS will come to you, so don't try to "revalidate" your 855 enrollment form unilaterally in CMS's Internet enrollment system, the Provider Enrollment, Chain and Ownership System (PECOS), says San Francisco attorney Judy Waltz, with Foley & Lardner. CMS says Medicare administrative contractors (MACs) will send notices to providers and suppliers between now and March 2013, and they should start the revalidation process as soon as possible. "Failure to submit the enrollment forms as requested may result in the deactivation of your Medicare billing privileges," CMS says. Revalidation stems from the health reform law, which injected new screening criteria in the Medicare provider and supplier enrollment process, effective March 2011. When providers are enrolling for the first time or revalidating, Medicare contractors screen them according to the presumed level of risk — limited, moderate or high — assigned to their category. Providers and suppliers who enrolled on or after March 25, 2011, are spared the revalidation because they were already screened pursuant to the health reform law. Meanwhile, Waltz reminds providers and suppliers to continually update certain information in PECOS, such as changes in board members and new locations. Read more about revalidation in MLN Matters #SE1126.