

September 29, 2009



CMS Targets SNFs in Upcoming Provider Enrollment Revalidation Effort

CLIENT ADVISORY

On August 21, 2009, the Centers for Medicare & Medicaid Services (CMS) announced that it will begin a limited provider enrollment revalidation effort in fiscal year 2009. The revalidation effort will focus on the top 50 skilled nursing facility (SNF) billers within each state that do not have an established enrollment record in the Provider Enrollment, Chain and Ownership System (PECOS). Initial revalidation letters will be sent to selected SNFs on October 14, 2009. Contacted SNFs will be given 60 days to furnish all requested information.

Current regulations require Medicare suppliers and providers to resubmit and recertify their enrollment information every five years. CMS can also trigger revalidations as part of national initiatives or for other reasons. The announcement does not specify the reason for this particular revalidation effort, but it is likely related to CMS' goal of establishing a record for each Medicare provider and supplier in the PECOS system in lieu of paper-based CMS-855 forms. PECOS is an Internet-based provider enrollment process that allows Medicare providers and suppliers the option of enrolling, reenrolling, making a change in their Medicare enrollment information, viewing Medicare enrollment information, or tracking the status of their Medicare enrollment applications throughout the Internet submission process.

CMS also stipulates that revalidation of enrollment information **does not** require a new state survey. SNFs that initially enrolled or that have been revalidated in the past 5 years will not be solicited during this effort.

In the initial announcement, CMS erroneously stated that the revalidation effort would focus on SNFs without an Electronic Funds Transfer (EFT) agreement in addition to those without an established record in PECOS. The announcement also stated that the revalidation effort would begin on September 21, 2009. The reference to EFTs and the original implementation date were rescinded in a follow-up transmittal on September 14, 2009.

If you have any questions about this CMS revalidation effort or require assistance with Medicare enrollment filings, please call Emily Towey at (804) 967-9604 or by email at etowey@hdjn.com. Additional information about Hancock, Daniel, Johnson & Nagle, P.C. is available on the firm's website at www.hdjn.com.

Hancock, Daniel, Johnson & Nagle, P.C.

Page 2



The information contained in this advisory is for general educational purposes only. It is presented with the understanding that neither the author nor Hancock, Daniel, Johnson & Nagle, PC, is offering any legal or other professional services. Since the law in many areas is complex and can change rapidly, this information may not apply to a given factual situation and can become outdated. Individuals desiring legal advice should consult legal counsel for up-to-date and fact-specific advice. Under no circumstances will the author or Hancock, Daniel, Johnson & Nagle, PC be liable for any direct, indirect, or consequential damages resulting from the use of this material.

For more information about HDJN visit the firm website at:
www.hdjn.com

Richmond 4701 Cox Road Suite 400 Glen Allen, VA 23060 PO Box 72050 Richmond, VA 23255-2050 ○ (804) 967-9604	Fairfax 3975 Fair Ridge Road Suite 475 South Fairfax, VA 22033 ○ (703) 591-3440
Harrisonburg 3210 Peoples Drive Harrisonburg, VA 22801 ○ (866) 967-9604	Virginia Beach One Columbus Center 283 Constitution Drive Suite 301 Virginia Beach, VA 23462 ○ (757) 321-6555
Lewisburg, WV 210 West Randolph Street Lewisburg, WV 24901 ○ (866) 967-9604	Franklin, TN 725 Cool Springs Blvd. Suite 600 Franklin, TN 37067 ○ (866) 967-9604