



Celebrating PECOS Postponement? Don't Get Too Comfortable

CLIENT ADVISORY

In June, HDJN issued a [reminder](#) of a fast-approaching deadline set by the Centers for Medicare and Medicaid Services ("CMS") – Medicare-enrolled physicians were required to enroll in the Provider Enrollment, Chain and Ownership Systems ("PECOS"), or face automatic rejection of Medicare claims beginning July 6. The deadline came, and with it, an unexpected reprieve from CMS.

Citing the number of physicians who have "encountered problems" with PECOS' cumbersome enrollment system, CMS has promised that it "will, for the time being, not implement changes that would automatically reject claims based on orders, certifications, and referrals made by providers that have not yet had their applications approved by July 6, 2010." (Read the entire CMS release here: <http://www.cms.gov/apps/media/press/release.asp?Counter=3774>.)

Providers are cautioned, however, that the regulation implementing mandatory enrollment nonetheless became effective as of July 6, and CMS, noting that over 800,000 providers and suppliers have successfully enrolled in PECOS to date, has not said how long it will extend this reprieve. In order to remain in full compliance with the regulation and demonstrate good faith, we strongly advise Medicare enrolled providers and suppliers to enroll in PECOS immediately, if they have not already done so. CMS maintains that the enrollment process is being continually streamlined, so

providers who quit the process earlier may find that it has now been simplified. Hospitals, in particular, should take advantage of this break to ensure that all physicians who treat patients at their facility (or, just refer patients to it) are enrolled in PECOS. A rejected claim for a physician means a rejected claim for the hospital, too.

If you have any questions regarding PECOS enrollment, or Medicare/Medicaid provider enrollment, please contact Emily Towey (etowey@hdjn.com), Rachel Suddarth (rsuddarth@hdjn.com), or Elizabeth Trende (etrende@hdjn.com) at 804-967-9604, or visit our website at www.hdjn.com.

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

Page 2



Hancock, Daniel, Johnson & Nagle, PC (HDJN) provides assistance and guidance to health care providers in virtually all legal matters affecting healthcare. Generally, these include corporate, employment, administrative, and transactional matters; litigation; and governmental affairs.

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.

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 111 North Jefferson Street Lewisburg, WV 24901 ○ (866) 967-9604	Franklin, TN 725 Cool Springs Blvd. Suite 600 Franklin, TN 37067 ○ (866) 967-9604

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