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## HEALTHCARE BULLETIN

*February 18, 2010*

### **CMS DELAYS PROVIDER ENROLLMENT IMPLEMENTATION DATE**

During an open-door forum held on February 17, 2010, The Centers for Medicare & Medicaid Services (CMS) announced that it will delay, until January 3, 2011 (Implementation Date), the requirement for providers to be enrolled in the Provider Enrollment, Chain, and Ownership System (PECOS).

The delay in implementing the enrollment requirement 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 the Implementation Date.

Although enrolled in Medicare, many physicians and non-physician practitioners who are eligible to order items or services or refer Medicare beneficiaries to other Medicare providers or suppliers for services do not have current enrollment records in Medicare. A current enrollment record is one that is in PECOS and also contains the physician/non-physician practitioner's National Provider Identifier (NPI). Following the Implementation Date, a physician or non-physician practitioner who orders or refers and who does not have a current enrollment record that contains the NPI will cause the claim submitted by the Part B provider/supplier who furnished the ordered or referred item or service to be rejected.

CMS continues to urge physicians and non-physician practitioners who are enrolled in Medicare but who have not updated their Medicare enrollment record since November 2003 to update their enrollment record now. If these physicians and non-physician practitioners have no changes to their enrollment data, they need to submit an initial enrollment application which will establish a current enrollment record in PECOS.

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Should you have any questions, please do not hesitate to contact one of our healthcare attorneys at the offices below.



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