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# MEDICARE ENROLLMENT FOR PROVIDERS WHO SOLELY ORDER, CERTIFY, OR PRESCRIBE



**Target Audience:** Medicare Fee-For-Service Program (also known as Original Medicare) and Medicare Part D drug, the Prescription Drug Benefit

The Hyperlink Table, at the end of this document, provides the complete URL for each hyperlink.





## **QUICK START**

# **GUIDE**

STEP \_\_\_\_

#### **Get an NPI**

- Check to see if you have one
- If not, apply online, via paper application, or through an EFI





#### **Enroll**

- Online in PECOS
- Via paper application (CMS-855O)





Respond to requests from your MAC for more information





Keep enrollment information up to date (use PECOS or paper enrollment form)





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Recent legislation requires physicians and other eligible professionals to enroll in the Medicare Program or have a valid opt-out affidavit on file to solely order or certify items or services, or to prescribe Part D drugs for Medicare beneficiaries.

Those physicians and other eligible professionals enrolled solely as ordering, certifying, and prescribing providers **do not and will not** send claims to a Medicare Administrative Contractor (MAC) for their services. Explore these booklets for information on Medicare enrollment for health care professionals that will submit claims for reimbursement:

- PECOS for DMEPOS Suppliers
- Medicare Enrollment for Institutional Providers
- Medicare Enrollment for Physicians, NPPs, and Other Part B Suppliers

**NOTE:** We use "you" and "eligible provider" to refer to physicians and other professionals eligible to solely order items, certify services, and prescribe Part D drugs.

This booklet outlines the requirements for providers who solely order, certify, or prescribe to enroll in Medicare. First, we describe who qualifies as eligible providers. Then, we explain how to enroll in Medicare as one of these eligible providers.

#### ORDERING AND CERTIFYING TERMS

Medicare Part B claims use the term "ordering/certifying provider" (formerly "ordering/referring provider") to identify the person who orders, prescribes, or certifies an item, drug, or service reported in a claim. The following are technically correct terms:

- A provider orders non-physician items or services for the beneficiary, such as Durable Medical Equipment, Prosthetics, Orthotics, and Supplies (DMEPOS); clinical laboratory services; or imaging services.
- A provider **certifies** home health services for a beneficiary.

The health care industry uses the terms "ordered," "referred," and "certified" interchangeably. To view comments about this terminology, read the <u>Changes in Provider and Supplier Enrollment</u>, Ordering and Referring [Certifying], and Documentation Requirements Final Rule.



# WHO ARE ELIGIBLE ORDERING/CERTIFYING/PRESCRIBING PROVIDERS?

This booklet focuses on Part D prescribers and any other physicians or eligible professionals who order or certify Part A or Part B services but do **not** want to submit claims to Medicare.

Any individual already enrolled as a Medicare Part B provider, DMEPOS supplier, or Part A Home Health Agency (HHA) provider may submit claims with ordering, certifying, or prescribing information, and receive payment without re-enrolling using Form CMS-855O. Those who enroll as eligible providers using Form CMS-855O **may not seek or receive reimbursement** from Medicare for services they furnish. They do not have billing privileges to submit claims to Medicare for services to Medicare beneficiaries.

Eligible providers must meet these three basic requirements:

- Have an individual National Provider Identifier (NPI)
   NOTE: Organizational NPIs do not qualify and cannot order, certify, or prescribe
- 2. Be enrolled in Medicare in either an "approved" or an "opt-out" status
- 3. Be of a specialty type that is eligible to order, certify, or prescribe

#### DENIAL OF ORDERING, CERTIFYING, OR PRESCRIBING CLAIMS

MACs deny the following claims if they lack a valid individual NPI:

- Claims from clinical laboratories for ordered tests
- Claims from imaging centers for ordered imaging procedures
- Claims from suppliers of DMEPOS for ordered DMEPOS
- Claims from Part A or Part B HHAs (services may only be ordered or certified by a Doctor of Medicine [M.D.], Doctor of Osteopathy [D.O.], or Doctor of Podiatric Medicine [DPM])

Part D plans will deny claims for Part D covered drugs if they lack a valid individual NPI.

If a billed service requires an eligible provider and one is not present on the claim, the MAC will deny the claim. Along with a valid individual NPI, the claim must contain the eligible provider's name as it appears in the Provider Enrollment, Chain, and Ownership System (PECOS).



## Requirement 1: You Must Have an Individual NPI

There are two types of NPIs: Type 1 (individual) and Type 2 (organizational). **Medicare allows only Type 1 NPIs for solely ordering items, certifying services, or prescribing Part D drugs.** You can apply for an NPI in one of three ways:

Online Application: If you have not done so, register for an Identity & Access Management (I&A) System user account.
 Then apply for your NPI through the National Plan and Provider Enumeration System (NPPES).

## NOT SURE IF YOU HAVE AN NPI?

Search for your NPI on the NPPES NPI Registry.

- 2. **Paper Application:** Complete, sign, and submit the NPI Application/Update Form (Form CMS-10114) paper application to the NPI Enumerator address on the form. To request a hard copy application, call 1-800-465-3203 or TTY 1-800-692-2326, or email customerservice@npienumerator.com.
- 3. **Bulk Enumeration:** Apply for <u>Electronic File Interchange (EFI)</u> access and upload your own comma-separated values (CSV) files.

#### ONE ACCOUNT, MULTIPLE SYSTEMS

The I&A System allows you to:

- Apply for and manage your NPIs in the NPPES
- Use PECOS to enroll in Medicare or update your current enrollment information

# Requirement 2: You Must Be Enrolled in Medicare in an "Approved" or "Opt-Out" Status

Once you have an NPI, use PECOS to verify you have a current Medicare enrollment record that **includes** your NPI and that you are in an "approved" or "opt-out" status. Table 1 explains options to verify whether your current enrollment record exists in PECOS.

Table 1. Options to Verify Your Current Enrollment Record Exists in PECOS

Verification Option	Enrollment Record Is Current If:
Refer to the Medicare Ordering and Referring files for physicians/non-physician practitioners (NPPs) and for power mobility device (PMD) suppliers.*	You are identified on one of these reports.
Visit PECOS to locate your enrollment record.	Your enrollment record displays a status of "approved" or "opt-out."



Table 1. Options to Verify Your Current Enrollment Record Exists in PECOS (cont.)

Verification Option	Enrollment Record Is Current If:
If you submitted an enrollment application as one of the eligible provider types on paper (Form CMS-855O) or via PECOS and want to check the status, refer to the Initial Physician Applications Pending Contractor Review and Initial Non-Physician Applications Pending Contractor Review datasets. Remember that these applications are not fully processed and are awaiting contractor review.	Your enrollment application is pending contractor review if you are on one of these reports.

<sup>\*</sup> Certain claims for PMDs will be denied if the ordering provider is not on Medicare's list of providers eligible to order them. Read Denial for Power Mobility Device (PMD) Claim from a Supplier of Durable Medical, Orthotics, Prosthetics, and Supplies (DMEPOS) When Ordered By a Non-Authorized Provider for more information.

If you do not have an enrollment record in PECOS, refer to the "How Do I Enroll in Medicare as an Eligible Provider?" section of this booklet.

## Requirement 3: You Must Be Eligible to Order/Certify/Prescribe

The physicians and eligible professionals who may enroll in Medicare solely for the purpose of ordering/certifying/prescribing Part D drugs include, but are not limited to, those physicians and eligible professionals who are:

- Employed by the Department of Veterans Affairs (DVA)
- Employed by the Public Health Service (PHS)
- Employed by the Department of Defense (DOD)/TRICARE
- Employed by the Indian Health Service (IHS) or a Tribal Organization
- Employed by Federally Qualified Health Centers (FQHCs), Rural Health Clinics (RHCs), or Critical Access Hospitals (CAHs)
- Licensed Residents (as defined in 42 Code of Federal Regulations [C.F.R.] Section 413.75(b)) in an approved medical residency program
- Dentists, including oral surgeons
- Pediatricians
- Retired physicians who are licensed

If you are not sure your specific provider specialty qualifies to enroll as an ordering or certifying provider, refer to Section 4 of Form CMS-855O or contact your MAC before submitting a Medicare enrollment application. Refer to the Medicare Fee-For-Service Provider Enrollment Contact List for MAC contact information for each State.



#### INTERNS AND RESIDENTS

Claims for items or services ordered or certified, or for covered Part D drugs prescribed by interns and residents, whether licensed or unlicensed, must specify the name and NPI of a teaching physician. State-licensed residents may enroll to order, certify, or prescribe, and claims may list them. However, if States provide provisional licenses or otherwise permit residents to order, certify, or prescribe, the Centers for Medicare & Medicaid Services (CMS) allows interns and residents to enroll to do so, consistent with State law.

### **HOW DO I ENROLL IN MEDICARE AS AN ELIGIBLE PROVIDER?**

CMS allows certain physicians and other eligible professionals to enroll in Medicare for the sole purpose of ordering or certifying specific items or services, or prescribing Part D drugs for Medicare beneficiaries.

#### STEP 1: OBTAIN AN INDIVIDUAL NPI

Providers must obtain an NPI before enrolling in the Medicare Program. See the earlier section, "Requirement 1: You Must Have an Individual NPI," for instructions on obtaining an individual NPI.

#### PROTECT YOUR INFORMATION

Your NPI and Tax ID are publicly available information. Use extra caution to monitor and protect your professional and personal information to help prevent fraud and abuse. You must also ensure your patients' personal health information is secure. CMS provides the following resources to help:

- Medicare Fraud & Abuse: Prevention, Detection, and Reporting
- Office of Inspector General
- Help Fight Medicare Fraud for patients



## STEP 2: COMPLETE THE PROPER MEDICARE ENROLLMENT APPLICATION

Once you have an NPI, you can apply to enroll in the Medicare Program, revalidate your enrollment, or change your enrollment information. Make sure you have the <u>information you need to enroll</u> before starting. Complete these actions using either PECOS or the paper enrollment form.

## A. Online PECOS Application

This is CMS' preferred method for Medicare enrollment. You must log in to <u>PECOS</u> with your I&A System credentials to initiate and complete the application process.

PECOS is a scenario-driven application—it presents a series of questions to retrieve only the information needed to process your specific enrollment scenario. You can submit all supporting documentation through PECOS.

#### PECOS IS EASY!

We encourage you to use PECOS instead of the paper Medicare enrollment application. Advantages of using PECOS include:

- Completely paperless process, including electronic signature and digital document feature
- Faster than paper-based enrollment
- Tailored application process means you only supply information relevant to your application and specialty
- More control over your enrollment information, including reassignments
- Easy to update and check your information for accuracy
- Less staff time and administrative costs to complete and submit enrollment to Medicare

## **B. Paper Medicare Enrollment Application (Form CMS-8550)**

The paper Medicare Enrollment Application: Eligible Ordering, Certifying, and Prescribing Physicians and Other Eligible Professionals (Form CMS-8550) is the application for enrolling solely to order, certify, or prescribe Part D drugs. Carefully complete and submit the paper enrollment application. Even if you submit your application on a paper form, a record is still created in PECOS.

**NOTE:** If you submitted an abbreviated Form CMS-855I to enroll solely to order/certify prior to the implementation of Form CMS-855O, your enrollment is still valid and you are not required to reapply.



## **Application Fee**

Physicians, NPPs, physician organizations, and non-physician organizations do not have an application fee. For more information about the provider types subject to an application fee, refer to the Application Fee Requirements Matrix.

# STEP 3: RESPOND TO REQUESTS FROM YOUR MACFOR MORE INFORMATION

Your MAC pre-screens and verifies all information on the enrollment application. During processing, you may need to submit additional information. Respond to any requests from your MAC as soon as possible, but within 30 days of the request. Failure to do so may delay enrollment or result in the rejection of the submitted application (deactivation). Once your MAC approves the application, it will switch the PECOS record to an "approved" status and send you an approval letter.

# STEP 4: USE PECOS TO KEEP ENROLLMENT INFORMATION UP TO DATE

You can report a change in your Medicare enrollment information using PECOS. You must report a change of ownership or control, a change in practice location, and any final adverse legal actions (such as revocation or suspension of a Federal or State license) within 30 days of a reportable event (see the PECOS FAQs section on reportable events for a definition). Submit all other changes within 90 days of a reportable event.





### **RESOURCES**

For more information about the Medicare enrollment process, visit the Medicare Provider-Supplier Enrollment webpage, which provides information about:

- PECOS, including how to update your records using PECOS
- Paper Medicare enrollment application forms
- Frequently asked questions
- Contact information for all MACs
- CMS updates on provider enrollment

Table 2. Resources

For More Information About	Resource
CMS External User Services (EUS) Help Desk	To report PECOS navigation, access, or printing problems, contact the CMS EUS Help Desk. Find contact information at EUS.custhelp.com.
Form CMS-855O Processing Guide	CMS.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/pim83attachment8550.pdf
I&A System Account Registration	NPPES.CMS.HHS.gov/IAWeb/register/start Registration.do
Initial Non-Physician Applications Pending Contractor Review	Data.CMS.gov/Medicare-Enrollment/Pending- Initial-L-and-Ts-Non-Physicians/n86y-dqck
Initial Physician Applications Pending Contractor Review	Data.CMS.gov/Medicare-Enrollment/Pending- Initial-L-and-Ts-Physicians/ip7y-ztn9
MACs	Provider Enrollment Contact List  CMS.gov/Medicare/Provider-Enrollment-and- Certification/MedicareProviderSupEnroll/ Downloads/contact_list.pdf  Review Contractor Directory – Interactive Map  CMS.gov/Research-Statistics-Data-and- Systems/Monitoring-Programs/Medicare-FFS- Compliance-Programs/Review-Contractor- Directory-Interactive-Map
MLN Matters® Article, Eligible Physicians and Non-Physician Practitioners who need to Enroll in the Medicare Program for the Sole Purpose of Ordering and Referring Items and Services for Medicare Beneficiaries	CMS.gov/Outreach-and-Education/Medicare- Learning-Network-MLN/MLNMattersArticles/ Downloads/MM7097.pdf



Table 2. Resources (cont.)

Table 2. Resources (cont.)	
For More Information About	Resource
MLN Matters Article, Instructions for Processing Form CMS-855O Submissions	CMS.gov/Outreach-and-Education/Medicare- Learning-Network-MLN/MLNMattersArticles/ Downloads/MM7723.pdf
MLN Matters Article, Denial for Power Mobility Device (PMD) Claim from a Supplier of Durable Medical, Orthotics, Prosthetics, and Supplies (DMEPOS) When Ordered By a Non-Authorized Provider	CMS.gov/Outreach-and-Education/Medicare- Learning-Network-MLN/MLNMattersArticles/ Downloads/MM8239.pdf
MLN Matters Special Edition Article, Full Implementation of Edits on the Ordering/Referring Providers in Medicare Part B, DME, and Part A Home Health Agency (HHA) Claims	CMS.gov/Outreach-and-Education/Medicare- Learning-Network-MLN/MLNMattersArticles/ Downloads/SE1305.pdf
MLN Matters Special Edition Article, Opting out of Medicare and/or Electing to Order and Certify Items and Services to Medicare Beneficiaries	CMS.gov/Outreach-and-Education/Medicare- Learning-Network-MLN/MLNMattersArticles/ Downloads/SE1311.pdf
NPI	CMS.gov/Regulations-and-Guidance/ Administrative-Simplification/NationalProvIdent Stand
Order and Referring Data Files, Eligible Physicians/NPPs	Data.CMS.gov/Medicare-Enrollment/Order-and-Referring/qcn7-gc3g
Order and Referring PMD Data Files, Eligible Physicians/NPPs	Data.CMS.gov/Medicare-Durable-Medical- Equipment-DME-/Order-and-Referring-PMD/ g6jg-y93m
PECOS	PECOS System PECOS.CMS.HHS.gov About PECOS CMS.gov/Medicare/Provider-Enrollment-and-Certification/MedicareProviderSupEnroll/Internet
PECOS Technical Assistance Contact	basedPECOS.html  CMS.gov/Outreach-and-Education/Medicare-
Information	Learning-Network-MLN/MLNProducts/MLN-Publications-Items/CMS1243418.html
Video Resources	YouTube.com/playlist?list=PLaV7m2-zFKpia1McB1WKKkw2esAdiZRem



Table 3. Hyperlink Table

Embedded Hyperlink	Complete URL
Application Fee Requirements Matrix	https://www.cms.gov/Medicare/Provider- Enrollment-and-Certification/MedicareProvider SupEnroll/Downloads/ApplicationFee RequirementMatrix.pdf
Change of Ownership or Control	https://www.cms.gov/Outreach-and-Education/ Outreach/FFSProvPartProg/Provider- Partnership-Email-Archive-Items/2017-05-18- eNews.html#_Toc482773810
Changes in Provider and Supplier Enrollment, Ordering and Referring [Certifying], and Documentation Requirements Final Rule	https://www.gpo.gov/fdsys/pkg/FR-2012-04-27/pdf/2012-9994.pdf
Check	https://npiregistry.cms.hhs.gov
Denial for Power Mobility Device (PMD) Claim from a Supplier of Durable Medical, Orthotics, Prosthetics, and Supplies (DMEPOS) When Ordered By a Non-Authorized Provider	https://www.cms.gov/Outreach-and-Education/ Medicare-Learning-Network-MLN/MLNMatters Articles/downloads/MM8239.pdf
Electronic File Interchange (EFI) EFI	https://nppes.cms.hhs.gov/webhelp/nppeshelp/ EFI%20HELP%20PAGE.html
For Physicians/Non-Physician Practitioners (NPPs)	https://data.cms.gov/Medicare-Enrollment/Order- and-Referring/qcn7-gc3g
For Power Mobility Device (PMD) Suppliers	https://data.cms.gov/Medicare-Durable-Medical- Equipment-DME-/Order-and-Referring-PMD/ g6jg-y93m
Help Fight Medicare Fraud	https://www.medicare.gov/forms-help-and-resources/report-fraud-and-abuse/fraud-and-abuse.html
Identity & Access Management (I&A) System I&A System	https://nppes.cms.hhs.gov/IAWeb
Information You Need to Enroll	https://pecos.cms.hhs.gov/pecos/help-main/ checklists.jsp
Initial Non-Physician Applications Pending Contractor Review	https://data.cms.gov/Medicare-Enrollment/ Pending-Initial-L-and-Ts-Non-Physicians/n86y- dqck



Table 3. Hyperlink Table (cont.)

Embedded Hyperlink	Complete URL
Initial Physician Applications Pending Contractor Review	https://data.cms.gov/Medicare-Enrollment/ Pending-Initial-L-and-Ts-Physicians/ip7y-ztn9
Medicare Enrollment Application: Eligible Ordering, Certifying, and Prescribing Physicians and Other Eligible Professionals (CMS-8550)	https://www.cms.gov/Medicare/CMS-Forms/ CMS-Forms/Downloads/cms855O.pdf
CMS-855O	
Medicare Enrollment for Institutional Providers	https://www.cms.gov/Outreach-and-Education/ Medicare-Learning-Network-MLN/MLNProducts/ MLN-Publications-Items/CMS1243482.html
Medicare Enrollment for Physicians, NPPs, and Other Part B Suppliers	https://www.cms.gov/Outreach-and-Education/ Medicare-Learning-Network-MLN/MLNProducts/ MLN-Publications-Items/CMS1243432.html
Medicare Fee-For-Service Provider Enrollment Contact List	https://www.cms.gov/Medicare/Provider- Enrollment-and-Certification/MedicareProvider SupEnroll/Downloads/contact_list.pdf
Medicare Fraud & Abuse: Prevention, Detection, and Reporting	https://www.cms.gov/Outreach-and-Education/ Medicare-Learning-Network-MLN/MLNProducts/ MLN-Publications-Items/CMS1243333.html
Medicare Provider-Supplier Enrollment	https://www.cms.gov/Medicare/Provider- Enrollment-and-Certification/MedicareProvider SupEnroll
National Plan and Provider Enumeration System (NPPES) NPPES	https://nppes.cms.hhs.gov
NPI Application/Update Form (Form CMS-10114)	https://www.cms.gov/Medicare/CMS-Forms/ CMS-Forms/Downloads/CMS10114.pdf
NPPES NPI Registry	https://npiregistry.cms.hhs.gov
Office of Inspector General	https://oig.hhs.gov
Online	https://nppes.cms.hhs.gov/IAWeb
Paper Application	https://www.cms.gov/Medicare/CMS-Forms/CMS-Forms/Downloads/CMS10114.pdf



Table 3. Hyperlink Table (cont.)

Embedded Hyperlink	Complete URL
PECOS FAQs	https://www.cms.gov/Outreach-and-Education/ Medicare-Learning-Network-MLN/MLNProducts/ MLN-Publications-Items/ICN909015.html
PECOS for DMEPOS Suppliers	https://www.cms.gov/Outreach-and-Education/ Medicare-Learning-Network-MLN/MLNProducts/ MLN-Publications-Items/CMS1243483.html
PECOS	https://pecos.cms.hhs.gov

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