

Month/ Year	Category	National Supplier Clearinghouse Advisory Committee (NSCAC) Questions July 2015	Answer	Status
July/2015	PECOS/DMEPOS	<p>1. The PECOS data base that maintains information about individual suppliers licensing information is riddled with issues.</p> <p>- NSC verification of licensure in the states that a supplier services: The NSCAC has brought up the issue of suppliers who are in multiple states who have different products being provided in those states. The NSC advised the NSCAC that the CMS 855S application and subsequently PECOS is not able to handle this scenario, and stated the supplier should add these details in a cover letter with the application.</p> <p>- The Cover letter option may work if sending applications via paper. Given that PECOS does not allow cover letters, to whom should providers address the Cover letter to assure we get proper licensure?</p>	<p>Suppliers are able to digitally upload documents through internet-based PECOS. The cover letter may be submitted along with the other supplemental documents—i.e. licensure, certification statements.</p>	
July/2015	PECOS/Physicians	<p>2. What is the current time frame expected if Physicians have recently re-enrolled in the PECOS System? Providers are unable to receive payment for claims processed due to the overlap in re-enrollment.</p>	<p>Under normal circumstances suppliers will have no interruption in billing privileges when responding to a request for revalidation.</p> <p>If this issue is regarding ordering/referring, it is outside of the NSC's scope.</p>	
July/2015	CMS 855/change of information/revalidation	<p>3. We continue to have concerns about the more strict definition and interpretation of who can be recognized as an Authorized Official on the NSC file. Especially for large, and very small companies, providers need to be able to designate the individuals who they know are aware of the NSC obligations and who also can be available and responsive for signatures and follow through.</p> <p>- There is a lot of inconsistency among NSC</p>	<p>We will continue to educate our staff and emphasize the importance of applying rules consistently. No unauthorized changes should be made to a supplier's enrollment record.</p> <p>Authorized officials are those who can legally bind an organization for the purpose of a federal government contract. Although there are many titles bestowed upon individuals having varying levels of responsibility, only those identified by CMS as 'authorized' may</p>	

		<p>reps as they process applications, revalidations, and other changes. We may submit the same information for multiple locations; one rep may accept the information we submit; another rep may call us and request changes; a third rep may just modify the information without informing us.</p> <p>- Of the most concern is that we have identified some instances where the NSC has changed the status of one or more of our AOs – deleting the AO status – without informing us that they had done so. This can create delays and issues with processing information; it creates even bigger issues with AOs listed with the CBIC and registered in PECOS.</p> <p>- Shouldn't the NSC be required to notify the supplier, if the NSC is making un-requested changes to the supplier's enrollment file?</p>	<p>assume the role for Medicare enrollment.</p> <p>Delegated officials may also make changes to enrollment records and can be assigned by the authorized official.</p>	
July/2015	CMS 855/change of information/revalidation	<p>4. At least two providers have reported several (at least 4) instances where revalidation requests were received; the providers did the work and submitted their revalidation responses; they were then contacted by the NSC and informed that the revalidation request had been sent out in error, and was not required.</p> <p>(a) Can you help us understand why this is happening? How many times has it happened?</p> <p>(b) The NSC stated that the fees that were paid would be refunded. Can you explain how that process works? What does the provider need to do to assure they receive the refund? How long will the refund process take?</p>	<p>The NSC mailed some revalidation letters to suppliers who were not yet scheduled for revalidation. This was a one-time incident that we trust will not reoccur.</p> <p>All refund requests have been submitted to CMS for processing.</p>	
July/2015	Licensure/Accreditation/Bonding	<p>5. Many states have licensure requirements along with exemptions. For example in the state of Alabama the HME Law requires an HME permit unless the supplier meets one of the exemptions listed on page 5 (Example AL HME State Law enclosed). If the supplier</p>	<p>For enrollment purposes, the NSC determines the application of any exemption information provided by the supplier. This information is not housed in PECOS, as it is not guaranteed to be a permanent exemption.</p>	

		<p>meets one of the exemptions, how are they to prove they meet the exemption?</p> <p>- For example AL HME Board has an exemption for Hospital Based HME Providers. If the provider is on the hospital campus they are exempt from licensure. There is nothing that requires the provider to even apply if they meet the exemptions but the exemption is not reflected by the NCS, even if it is submitted.</p> <p>- This has become an ongoing issue with Competitive Bidding. The enclosed example (Example CBIC Denial) includes a copy of the AL State Law and a denial from CBIC. The CBIC states they pull the data from the NSC. NOTE: There are several examples from different providers that have experienced the same denial.</p>	<p>While the NSC and CBIC work collaboratively, we are independent contractors making independent decisions based on contract requirements. With this, the supplier is responsible to provide any necessary proof to validate exemptions.</p>	
July/2015	Site Visits/Overland Solutions	<p>6. We had an inspection from OSI about a month ago with no findings and today we received a telephone call asking for additional records from the OSA inspector. Can those requests be put in writing or should they be coming from the NSC in writing since it is so long after the fact? We are nervous about a phone call because there is no way to prove dates (NSC Site Visit Example 1).</p>	<p>Typically OSI would not wait a month to request information; however, this particular representative is new and was being educated on the process. The employee's failure to request specific information on the acknowledgement form prompted Overland Solutions to educate the employee on what items are needed. Hence, the employee requested documentation further down the development process than normal.</p> <p>This is not the norm and Overland Solutions is aware that if they do not collect items during the visit to immediately request them so the site visit can be submitted in a timely manner. Any further development will be done by NSC while we review the documentation submitted</p>	

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