

NSCAC MEETING WITH NSC
JANUARY 18, 2006

1. OLD QUESTIONS FOLLOW-UP:

a. GAO supplier enrollment report. NSC response.

Information was provided at the meeting from CMS and the NSC regarding what steps are being taken to implement some of these recommendations. Information was reviewed with the NSCAC via Nancy Parker.

No further discussion

b. Quality Standards

NSC answer: There is no update at this time

NSCAC: Some update was given by Betsy Horn. No changes.

c. National Provider Identifier: The question was asked how will the NSC be involved in the process and how will it be tied in with this committee?

Answer: The NSC will not be the source of NPIs for the DMERCs. CMS is building a crosswalk file of NSC to NPI numbers, which the DMERCs will use for processing. NSC expects to begin requesting supplier NPI numbers in May, with the implementation of the new CMS 855S form.

Additional comment: Nancy Parker - the NSC does not have answers about crosswalks and there is no contact person available at this time to help with this. NSC will follow up as more information is available.

NSCAC: no changes

d. Accreditation:

NSC answer: There is no update at this time

NSCAC: No changes

e. 855S Comments Update:

CMS is currently reviewing the comments provided by the supplier community and based on these comments plans to post an updated version of the revised CMS 855S form for comment. CMS is aiming to implement the revised CMS 855S in May 2006.

Additional comments: Nancy Parker - the new 855S will ask for NPI numbers beginning in May 2006 NSC will NOT be processing the NPI numbers for providers.

NSCAC: No change

New Questions:

1. I own two separate companies with two unique supplier numbers. I am going to close one of the companies and absorb those patients in the other company. What is the proper documentation to send to the NSC to notify them of the closing of one company and what is the required timeframe for notification?

Answer: Supplier standard #2 requires suppliers to notify the NSC of any change within 30 days. Therefore, the supplier would be required to notify the NSC within the required timeframe. The supplier should submit a request to terminate their supplier number on the CMS 855S. However, the NSC will accept a letter requesting termination. The letter should be on company letterhead, specifically request voluntary termination, list the supplier number and state an effective date. The supplier number will be inactivated the date indicated by the supplier. Therefore the supplier should indicate a date that will not cause a lapse in billing. The supplier should also ensure the authorized official has signed and dated this letter with an original signature. Only the authorized official has the authority to terminate a supplier number.

If the supplier needs to update the information for the supplier number that is to remain active, the supplier may submit the required sections of the CMS 855S in addition to the CMS 855S form terminating the supplier number or the letter requesting voluntary termination.

For example, if the supplier was providing different products and services at the location being closed from those at the active location, and subsequently will be providing those products and services at the active location, then the supplier would be required to submit a change of information. The supplier would do this by submitting sections 1, 2 and 15 of the CMS 855S. The supplier should also ensure section 15 has the original signature and date of the authorized or delegated official and that all required licensed to provide the additional products and services are submitted.

NSCAC: No changes

2. I have heard from previous meetings that chain organizations, such as WalMart, Eckerd, RiteAid, etc. are NOT inspected by the NSC nor are on-sites being done for each location. But yet, Independently owned operations, regardless of how many locations, are individually inspected for each location and must follow the rules for each retail location. Why does this inequity exist?

Answer: If an impression was given that large chains do not receive site visits, then this is in error. Please understand the NSC can and does conduct site visits on these entities.

The NSC operates by following CMS' instructions. These instructions lay the foundation of how CMS expects the NSC to operate and we as the NSC follow these instructions as required. These instructions clearly state the NSC is not required to routinely conduct site visits on entities with 25 or more active locations. Because of budget constraints and the fact these entities are well established and have been thoroughly reviewed, CMS feels the money is better spent investigating smaller companies and fly-by-night operations.

Please let us reiterate, the NSC will and does conduct site visits on suppliers with 25 or more active locations. Also, if a complaint is received or if information obtained through data analysis warrants a site visit, the NSC will certainly do so with no hesitation. The NSC, along with other entities responsible for protecting the Medicare trust fund, do review and monitor all suppliers, including large chains and will take the necessary steps to ensure all suppliers are in compliance with the 21 supplier standards. Further, if suppliers maintain compliance with the supplier standards, then a site visit should not be an issue.

NSCAC: No changes.