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## Required Part D Prescriber Enrollment in Medicare

Narrator:

You're listening to ReachMD. Welcome to this medical industry feature entitled Required Part D Prescriber Enrollment in Medicare sponsored by the Centers for Medicare and Medicaid Services. This program is intended for prescribers, including physicians and nurse practitioners.

Dr. Birnholz:

Do you write prescriptions for patients who are part of a Medicare Prescription Drug Plan Part D?

This is ReachMD, and I am your host, Dr. Matt Birnholz. I'd like to welcome Dr. Shantanu Agrawal, MD, to the program. Dr. Agrawal is a Board Certified Emergency Medicine Physician and Fellow of the American Academy of Emergency Medicine. He is currently serving as an appointee for the Obama Administration as Deputy Administrator for Program Integrity and Director of the Center for Program Integrity at the Centers for Medicare and Medicaid Services, or CMS. In his role at CMS, he works to improve healthcare value by lowering the cost of care through the detection and prevention of waste, abuse and fraud in the Medicare, Medicaid and CHIP programs and the Marketplace.

Dr. Agrawal, thank you so much for being here to share your insights on the topic of Part D Prescriber Enrollment in Medicare.

Dr. Agrawal:

Sure, thank you for having me.

Dr. Birnholz:

So, Dr. Agrawal, to start, prescribers of covered Part D drugs are now required to enroll in Medicare. Why did this requirement occur?

Dr. Agrawal:

Sure. So, first, we've already had this requirement in place for the rest of Medicare, so if you are a physician or other provider seeing a Medicare patient and billing for those services, you've already had to enroll in the program. That enrollment requirement has now extended to the Prescription Drug Benefit part of Medicare or Part D. We can see larger pictures of prescribing behavior that looks like outlier behavior in the prescription drug program. There are prescribers that do not seem to be following usual patterns and might, therefore, be placing patient safety at risk or even engaging in fraudulent or abusive behavior.

If the prescriber is not enrolled in Medicare, then CMS has historically had complications trying to take action to protect these patients. So, for example, if we see a prescriber prescribing an uncharacteristically high volume of opioids, we can analyze and investigate the situation to understand what is really going on. And once this enrollment requirement is in place, if the prescriber is abusive, we now would have the ability to take action to protect others.

This is really important considering the current opioid epidemic in the United States. As you know, over 28,000 people died in 2014 due to opioids, and over half of those deaths were from a prescription opioid overdose. CMS wants to be able to address these few prescribers that are abusing the system and feeding this epidemic or committing other types of fraud.

Dr. Birnholz:

That certainly makes sense. Well, what type of prescribers are required to enroll?

Dr. Agrawal:

It would be any prescriber of Part D medications. That would include dentists, physicians, trainees like residents or fellows, nurse practitioners and physician assistants. They are all required to enroll to write prescriptions that are covered by the Part D program. A

complete list of impacted prescribers is available on the CMS website at [go.cms.gov/PrescriberEnrollment](https://go.cms.gov/PrescriberEnrollment), with a capital P and E. If a prescriber is trying to decide if they have Part D patients and if this requirement is relevant for them, they should know that Part D patients are patients that are enrolled in Medicare. They are usually seniors, age 65 or over, but they can also be younger. Prescribers should enroll to make sure their patients will continue to get the medications they prescribe for them. If a prescriber is already enrolled in Medicare for another purpose, the prescriber does not have to enroll again just for Part D purposes. They are already meeting this requirement. Prescribers can also opt out of Medicare to meet the requirement.

Dr. Birnholz:

Now, what about timing? What should prescribers know about timing?

Dr. Agrawal:

That will help to avoid any delay in processing of the application or opt out prior to the new enforcement date. After the enforcement date, prescribers are required to either be enrolled in Medicare or to have opted out in order for Part D medications to be covered by prescription drug plans. These two distinct dates allow enough time, we believe, for prescribers to apply for enrollment (and be approved by the enforcement date) so no patients are impacted or limited by this requirement.

Dr. Birnholz:

And does enrollment cost anything?

Dr. Agrawal:

No, enrollment is free, and the application process can actually take less than 30 minutes if done online.

Dr. Birnholz:

So, then how does a prescriber meet this requirement?

Dr. Agrawal:

There are three options available to meet the requirement. First, and our suggested option, is to enroll in Medicare to order, refer and/or prescribe. This status allows continued prescribing of Part D medications but does not change the patients that the prescriber sees. Prescribers are not enrolling to treat Medicare patients or to bill the Medicare program, just to order, refer or prescribe. The second option is for prescribers to fully enroll to treat patients and bill the Medicare program.

Both of the options I just mentioned can be completed online by using the Medicare Provider Enrollment Chain and Ownership System, or PECOS website, at [go.cms.gov/pecos](https://go.cms.gov/pecos) or by downloading the appropriate CMS 855 Medicare enrollment hard copy forms and mailing the completed forms to your local Medicare Administrative Contractor, or MAC. To order, refer and/or prescribe, the 855o form should be completed. To fully enroll to treat patients and bill the Medicare program, the 855i form should be completed. For the hard copy form option, we recommend getting proof of receipt for your mailing.

The third option is to opt out. If a prescriber decides to opt out, they will not be reimbursed by Medicare for services rendered to Medicare patients. This also applies to services provided to patients who are enrolled in Medicare Advantage Plans, also known as Medicare Part C. In addition, once a prescriber opts out, they are locked into that status for a 2-year period. It is important to consider these factors when making the decision to opt out. "Opting out" may sound like a prescriber does not have to do anything, but to pursue this option, the prescriber should complete and mail an affidavit to their local MAC, and the affidavit must state the decision to opt out of the program.

Dr. Birnholz:

There appear to be several available options to fulfill this requirement, but if a prescriber needs more information on any of the options, where should they go?

Dr. Agrawal:

Prescribers can visit the CMS website I mentioned earlier, [go.cms.gov/PrescriberEnrollment](https://go.cms.gov/PrescriberEnrollment) for more information on this requirement and the enrollment process. The landing page contains helpful resources including enrollment "how-to" guides, a video tutorial, lists to help prescribers check their enrollment status, information on opting out and MAC contact information. MACs also help prescribers enroll in Medicare and answer related questions.

Dr. Birnholz:

Well, if you are just tuning in, you are listening to ReachMD. I am your host, Dr. Matt Birnholz, and I'm speaking with Dr. Shantanu Agrawal, Deputy Administrator and Director for the Centers for Medicare and Medicaid Services on the topic of Part D Prescriber Enrollment.

Dr. Agrawal, what happens if a prescriber doesn't enroll in Medicare?

Dr. Agrawal:

Once the enforcement date has passed, Part D plans will start to deny a patient's prescriptions at point of sale, meaning at the pharmacy, for medications prescribed by any medical professionals who are not enrolled in Medicare. CMS wants to really limit the patient impact as much as possible through this rule and has been working to educate prescribers so that everyone is enrolled before the enforcement date. CMS has also required Part D plans to cover a one-time, three-month provisional supply of the patient's medication. The plan must also provide patients with individualized written notice when denying a claim or a patient-requested reimbursement if the denial is based on the prescriber not being enrolled, in an approved status, or officially opted out. The one time three-month provisional supply is intended to give the prescriber time to enroll in Medicare and at the same time ensure that there's as little impact on the patients as possible.

Dr. Birnholz:

Dr. Agrawal, we're running out of time, but before we conclude, can you quickly summarize some of the main points of our discussion today?

Dr. Agrawal:

Three main takeaways prescribers should remember are the following: First, we really want you to be part of the solution. Prescriber enrollment is a piece of the transparency into Part D prescribing and really helps CMS to ensure patient safety and fight fraud in the Part D program. Prescribers have to be enrolled in Medicare to prescribe these medications, and enrollment is free, easy to do. Online and paper applications are both available. Not taking action could negatively impact your practice or patients, which we definitely want to avoid. Finally, I think it's important for prescribers to check their enrollment status. They can go to [go.cms.gov/PrescriberEnrollment](https://www.cms.gov/PrescriberEnrollment), the website I mentioned earlier, to confirm their enrollment status in the Medicare program and make sure that they're ready.

Dr. Birnholz:

Dr. Agrawal, are there any final thoughts you'd like to share with your listeners?

Dr. Agrawal:

We really encourage prescribers to take advantage of the numerous resources we have available to them, which are online. They can go to their Medicare Administrative Contractors, which are an invaluable resource during the enrollment process. And finally, that we believe that full enrollment is really crucial for the program. CMS is dedicated to helping prescribers achieve compliance in this important area and ultimately to ensure patient safety, which I think is a value we share with prescribers as well.

Dr. Birnholz:

With that, I very much want to thank Dr. Shantanu Agrawal, Deputy Administrator and Director for the Centers for Medicare and Medicaid Services. We've been talking about Part D Prescriber Medicare Enrollment.

Dr. Agrawal, thanks so much for joining me today.

Dr. Agrawal:

Sure, thank you.

Narrator:

You've been listening to ReachMD. The preceding program was sponsored by Centers for Medicare and Medicaid Services. If you have missed any part of this discussion, visit [ReachMD.com/PartDPrescriber](https://www.ReachMD.com/PartDPrescriber).