

Update: CMS' Accelerated & Advanced Payments Program – Part II March 31, 2020

Monday, March 30, 2020, we provided the following update on the CMS Accelerated and Advanced Payments Program. Please note that this a very fluid situation with CMS updates coming out almost daily on the PHE and three federal statutes signed in the past three weeks related to the coronavirus:

"After the signing of The CARES Act on Friday 3/27/20, CMS announced an advanced payment application process to Medicare enrolled clinicians ("providers and suppliers" including physicians and APPs) who have billed Medicare for 180 days prior to their application for advanced payments. Please note that this is NOT a loan or grant program and will last for the duration of the Public Health Emergency (PHE)."

Here are several updates and clarifications that we have obtained directly from CMS in the past 24 hours:

Terms of the Advanced Payments

According to CMS, the Medicare Part B MACs will determine the level of the 3-month advanced payments based on Medicare Part B payments and net reimbursements from 10/1/2019 to 12/31/2019. To the best of our understanding, Medicare Advantage is not part of the Accelerated Advanced Payment Program.

Repayment and Recoupment

As noted in detail yesterday, the advanced payments program is not a grant. Repayments will begin automatically by the Medicare MACs based on recoupments on day 121 days after issuance of the advanced payment.

- For Part B Clinicians, they will have 210 days total to repay the advanced payments, from the date of advanced payment.
- It is not known at this time how the Medicare MACs would address repayments of advanced payments that extend past the 210-day period noted above.
- For example, a \$300,000 advanced payment issued on 4/1/20 would automatically begin to be recouped by the Medicare MAC on 8/1/20 and total repayment would be by 11/1/20.

For any client applying for this program, please notify your Client Service Manager, so we can make Operations aware of the advanced payment. Also, please note the application process varies by MAC. Below is a list of the MAC's contact information for the Accelerated and Advanced Payments Program:

CGS: Toll-free Hotline Telephone Number: 1-855-769-9920; Hours of Operation: 7:00 am – 4:00 pm CT



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- CGS Landing page
- CGS Accelerated Advanced Payments Form

FCSO: Toll-free Hotline Telephone Number: 1-855-247-8428; Hours of Operation: 8:30 AM – 4:00

Website

NGS: Toll-free Hotline Telephone Number: 1-888-802-3898 Hours of Operation: 8:00 am – 4:00 pm CT

Noridian: Toll-free Hotline Telephone Number: 1-866-575-4067 Hours of Operation: 8:00 am – 6:00 pm CT

- This hotline will answer questions on provisional billing privileges and enrollment flexibilities afforded by the COVID-19 waiver for health care facilities and providers;
- As well as on Part A, B, and DME accelerated/advance payments related to COVID-19.

Novitas: Toll-free Hotline Telephone Number: 1-855-247-8428 Hours of Operation: 8:30 AM – 4:00 PM ET

Novitas Accelerated Advanced Payments Form

Palmetto: Toll-free Hotline Telephone Number: 1-833-820-6138 Hours of Operation: 8:30 am – 5:00 pm ET

Palmetto GBA Accelerated Advanced Payments Form

WPS: Toll-free Hotline Telephone Number: 1-844-209-2567 Hours of Operation: 7:00 am – 4:00 pm CT

For questions please contact Ed Gaines <u>egaines@zotecpartners.com</u> or Lonnie Johnson <u>ljohnson@zotecpartners.com</u>