

Life Made Easier with CMS's Surrogacy Program

STREAMLINE YOUR ACCESS
TO PECOS, EHR,
AND NPPES **p. 10**



Earn 0.5 CEUs toward your CHBME designation, right from this issue! **p. 35**

Compliance

■ **Vendor Security**

What it means to be
HIPAA compliant. **p. 15**

Security

■ **Cybersecurity for Sensitive Data**

A new framework for protection. **p. 18**

Workflow

■ **Optum Cloud Dashboard**

Administrative efficiencies for
healthcare professionals. **p. 21**

MORE!

President's Message: Help HBMA Remain Strong in 2015 • **ICD-10:** Don't Let the Coding Get Lost in Translation
Excel Shortcuts: Business Intelligence for Medical Practices • **From the Road:** You Can't Do It All Yourself

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STREAMLINE YOUR ACCESS TO PECOS, EHR, AND NPPES

By David Zetter

In early 2010, members of the Medicare Provider Enrollment, Chain, and Ownership System (PECOS) Power User Group met with Centers for Medicare & Medicaid Services (CMS) officials to discuss updates needed for the PECOS program. The mission of the Power User Group is to inform CMS of what works – and what doesn't work – and find ways to make it easier for the provider and organization community to do business with CMS.

Members of the Power User Group, including myself, informed CMS that providers rarely perform their own enrollments or updates to their enrollments. The Power User Group meetings revealed that providers and organizations were not going to start doing all of this work themselves. CMS learned that there were too many other parties completing this work on behalf of the providers and organizations, so they had to develop a system that would allow for others to work on behalf of the providers and organizations.

Here are the initial issues CMS needed to resolve:

- Individual providers assigned others to work on their behalf in PECOS or the National Plan & Provider Enumeration System (NPPES).
- The sharing of personal account information caused security violations.
- The process for gaining access to PECOS took weeks, was not clear, and required mailing documents to External User Services (EUS).
- Users were required to contact EUS to reset forgotten usernames and passwords.

Exposing these issues helped make the Surrogacy Program (Identity & Access Management System, or I&A) a reality.

How We Got Here

There were several issues that led to the development of the Surrogacy Program. The username and password that a provider or organization uses to obtain its National Provider Identifier (NPI) and create its NPPES account is the same username and password used for accessing PECOS and electronic health record (EHR) registration and attestation. Most of us (billing department personnel, credentialers, provider/organization staff, third-party vendors, etc.) realize that most providers and organizations rarely set up their initial accounts or enrollments or complete their EHR meaningful use registration and attestation. So, the providers and organizations share that information with others to get the work done on their behalf.

There's one problem with this: CMS regulations do not allow providers and organizations to share this information with anyone. There are privacy issues and, more importantly, fraud and abuse implications.

STEPS FOR USING I&A

1. Set up your account as an AO or DO
2. Choose an employer - conduct a search based on the legal name of your organization and the zip code
3. Select whether you will be the AO or DO for the organization
4. Provide proof of your employment to officially set up your account
5. Set up connections with providers and organizations
6. Manage your staff's connections and access status
7. Enjoy streamlined access to PECOS, EHR, and NPPES!



Many of us have been violating CMS regulations for quite some time because there was no better way to ensure provider and organization initial enrollment with NPPES and online PECOS was completed and make sure existing enrollment files are updated in a timely manner. CMS could choose to enforce these regulations, except almost everyone is guilty of sharing this information.

3. Enrolled group (with individual provider) working with a third party.

A provider with an NPI login username and password will use that same username and password to log in to I&A and create their profile. Every account in I&A needs to have a unique email address – no two accounts can use the same email. For this

Most of us realize that most providers and organizations **rarely set up** their initial accounts or enrollments or complete their EHR meaningful use registration and attestation.

Complete All Your Work at Once

There are many reasons why you should use the Surrogacy Program. When you set up your own account in I&A and make connections with the providers and organizations you intend to work on the behalf of, you will only have one username and password to remember. If you perform work in NPPES, PECOS, or EHR, you will be able to see all of your connections (providers and organizations) and access all three systems with your login username and password. No more usernames and passwords to document and remember. You will still have to access each product separately, but you will be able to complete your work on all providers and organizations at one time while in each product (NPPES, PECOS, or EHR).

There are three options for setting up the Surrogacy Program:

1. Individual provider working for an enrolled group;
2. Enrolled organization working with a third party; and

reason, you will need to know the proper email address for each provider or organization you are working on the behalf of.

As an HBMA member, you could be in a situation where you would be working on behalf of all three options above. An appointed official with the authority to legally bind your organization must register in I&A, add the organization as his or her employer, and then follow directions to send appropriate documents to EUS, which is mentioned below.

Using the Surrogacy Program

Your first step in the Surrogacy Program process will be to set up your own account as an authorized official (AO) or delegated official (DO) in I&A. Once you have set up your account, you will need to choose an employer. Do this by conducting a search based on the legal name of your organization and the zip code. These details are the only two identifying items you will need, as



I&A will go to the IRS system to conduct a search for the legal name. The zip code helps to identify the proper organization, given that the same name could be used in different states but not within a state.

Once you have chosen your employer, you will need to select from a drop-down menu whether you will be the AO or DO for the organization. After making your decision, you will need to provide proof of your employment by mailing or emailing a copy of the IRS document that identifies your organization's tax ID, which is usually the CP-575 form or letter 147C. There are several other options that you may choose from if you do not have one of these documents available. You will need to submit IRS documentation to EUS for review prior to receiving approval for your role with the organization if you are a newly enrolling entity, an AO or DO that is not listed on an existing enrollment, or an AO or DO for a third party that does not have an NPI and does not qualify as an enrolling entity.

You will not be able to use your account or choose connections with providers or organizations until you have been approved by EUS. Mailing the document will take approximately two weeks to process, and you will be notified by email. If you have chosen to be a DO and your AO has already set up their account, you may be approved very quickly once the AO approves your account or sets it up for you. An approved AO or DO may then set up staff users to act on behalf of the organization.

An AO or DO for an organization can make a request for their organization to work on behalf of a provider. Once approved, anyone in the AO's or DO's organization (e.g., staff) may work on behalf of that provider.

Once you have set up your account(s), it is time to set up connections with providers and organizations. There are two important steps to take. First, determine if you will be setting up the connection between your organization and your providers and organizations or whether you will rely on the provider or

organization to complete the process. If you will be setting up provider and organization accounts, you will be using their login username and password one last time to complete the connection for you to be their surrogate. I highly recommend that you obtain, in writing, authorization from each provider and organization that you have their permission to use their login credentials.

If you are not going to set up each provider or organization's account, you will need to notify the provider or organization that you will set up yourself and your organization as a surrogate to work on their behalf. Providers and organizations will receive emails the minute you request a connection, and you will want them to complete that connection by logging in to their I&A account and approving the connection to your organization.

In many situations, you will be setting everything up for your providers and organizations because they will not want to be bothered with this process. For many, it would be the first time they would access their I&A account, and they probably know nothing about it. As you make a request for a connection to your organization on behalf of the provider or organization, you will need to choose which products (PECOS, EHR, and/or NPPES) the provider or organization will grant you access on their behalf.

QUICK TIP!



A provider or organization approving a connection (surrogate) to work on their

behalf does not give that user authority to sign Medicare enrollment applications in PECOS. All enrollment applications are still required to be signed by the individual provider or appropriate official of the organizational provider.

You do so by checking the box next to each product.

As you set up each provider or organization account and request a connection with your organization, you may log in to your account as an AO or DO and approve those requests. You will see an approval and rejection button for each product chosen on behalf of the provider or organization. If the provider is completing the connection, they do have the ability to reject a connection request. It is best to communicate in advance so they are informed of what to do. Additionally, email notifications are sent to all users when new connections are created.

It will take approximately 24 hours for this connection to be recognized by PECOS and/or EHR. NPPES is a completely different system and is currently not available once you have become a surrogate, but CMS expects this to be available in the future.

As an AO or DO, you have the ability to manage your staff. You may create connections to allow access for staff and you can invite and manage the providers your staff may access. You may turn access privileges off if a staff member leaves your organization.

Only approved AOs and DOs are able to create and manage connections. If you have been authorized to perform these functions, you will need to perform a role change request in the "My Profile" page under the employer information section at the bottom of the page and have your AO approve you to be a DO. Once approved, a connection will not expire, but either party may log in and remove the connection at any time.

AOs and DOs are able to see all the individual providers who have approved the third-party organization as their surrogate. Staff must be given access to those records by an AO or DO.

Existing Users

Any AO, staff end user, or individual provider who previously accessed PECOS, NPPES, or EHR already has an account. Existing usernames and passwords previously used to access PECOS, EHR, and NPPES have been converted and may still be used in I&A.

So now that you have completed all of this work to set up your provider or organization I&A accounts and your own organization account(s), what benefit will this provide you? The login username and password you chose for your account may now be used to log in to PECOS, EHR, and, eventually, NPPES. Once you log in to PECOS, you can go to the "My Enrollments" tab and see all the providers' and organizations' Medicare enrollment files available to you to access. You can use one login username and password.

The same will be the case with EHR. Log in using your username and password and all providers and organizations will be listed

HELPFUL DEFINITIONS

ORGANIZATIONAL PROVIDER

An organization that provides medical items and/or services to Medicare beneficiaries (e.g., DMEPOS supplier, physician group practice, hospital, etc.). This organization must have or be eligible for a Type 2 NPI in NPPES.

THIRD-PARTY ORGANIZATION

A third-party organization (e.g., billing agency, credentialing consultant, or other staffing company) that has business relationships with individual providers or organizational providers to work on their behalf.

SURROGATE

An employee (e.g., staff, AO, or DO) of an individual provider, organizational provider, or third-party organization who is authorized to access, view, and modify information within CMS computer systems on behalf of their employer; or an organizational provider that has a business relationship with an individual provider to access, view, and modify information within CMS computer systems on their behalf; or a third-party organization that has a business relationship with an individual provider or organizational provider to access, view, and modify information within CMS computer systems on their behalf.

for you to work on EHR Meaningful Use registrations or attestations. This will save you a lot of time, whether utilizing PECOS or EHR, as you will no longer have to log in and out of multiple accounts and remember multiple usernames and passwords. ■



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