PUBLICATION

PECOS Basics

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PECOS, the Provider Enrollment, Chain, and Ownership System, is a national electronic database for recording and retaining data on Medicare-enrolled providers and suppliers. CMS developed PECOS as a mechanism to combat fraud and abuse. When it proposed its plan to launch the use of the PECOS database in October 2001, CMS announced "it will now be possible to link providers/suppliers to the people and organizations with which they have a business relationship and to identify those involved in illegal Medicare activities."

In July 2002, fiscal intermediaries began entering enrollment data for Medicare Part A providers into the system, with carriers following in November 2003, entering data on Part B providers and suppliers. Enrollment data on DMEPOS suppliers is maintained in a separate database at this time but will eventually be incorporated into the PECOS database.

When PECOS first became operational, it was used for entering enrollment data on new providers and suppliers; however, data on already enrolled providers and suppliers was not entered into PECOS. That changed with the overhaul of the enrollment rules effective June 2006, when CMS implemented standardized procedures to collect and update enrollment data maintained in PECOS, initiated revalidation requirements, established sanctions for failing to timely provide updated enrollment data, and published revised application forms so that NPI data could be collected. CMS guidance regarding enrollment rules is found in Chapter 10 of the CMS Program Integrity Manual.

Providers and suppliers have two options for reporting enrollment data when initially enrolling or providing an update to previously reported data — paper applications and Internet-based PECOS.

The paper versions of the enrollment forms are available on CMS' website in Adobe files that have form fields to allow the forms to be completed electronically. The forms have to be printed and signed prior to submission to the enrollment contractor for processing. CMS periodically modifies its enrollment forms, and submission of an initial enrollment or enrollment update on an incorrect form will result in a rejection of the application, which may delay the effective date for the enrollment or change. Therefore, it is important to go to the CMS website prior to completing an enrollment application and verify that the most current application is being completed. Listed below are the links to the CMS 855 forms for Medicare Provider and Supplier enrollment:

- 855A (Institutional Providers)
- 855B (Clinics/Group Practices and Certain Other Suppliers)
- 855I (Physicians and Non-Physician Practitioners)
- 855S (Durable Medical Equipment, Prosthetics, Orthotics, and Supplies (DMEPOS) Suppliers)

Internet-based PECOS is an online alternative to the paper versions for completing enrollment applications. In order to enroll using the online applications, authorization to access and complete the applications must first be obtained. CMS implemented a security system to register users and control issuance of User IDs, passwords and access to CMS web-based applications. Individual enrollees (physicians and non-physician practitioners) use the Individuals Authorized Access to the CMS Computer Services ("IACS") system. Medicare supplier enrollees (group practices and other types of supplier) use the IACS Provider/Supplier Community ("IACS-PC")

system. Additional information about Internet-based PECOS is available at: www.cms.gov/MedicareProviderSupEnroll/04_InternetbasedPECOS.asp.

As a practical matter, many enrollees find the paper applications far less cumbersome and time consuming to complete, especially since the certification still needs to be printed and sent via the mail. Even CMS acknowledges that when applications need to be completed in short order, Internet-based PECOS will likely delay the enrollment due to the time to register and obtain access through the security system.