

# HEALTH LAW

## Update

NEWS FOR THE CLIENTS AND FRIENDS OF BASS, BERRY & SIMS PLC

---

### Brave New E-World: Accessing, Updating, and Submitting Medicare Provider Information Online

March 27, 2008

CMS has recently initiated an outreach and education effort regarding the initial phase of enabling providers to access, update and submit Medicare-related information electronically. This outreach effort, communicated through a series of MLN Matters<sup>1</sup> articles, affects individual practitioners, providers and suppliers who submit fee-for-service claims to Medicare contractors (collectively, "Providers").

While the details of the electronic system are forthcoming, CMS recommends that Providers take action soon to set up accounts online so that when the web-based applications are up and running, Providers are able to access them readily. In order to manage and control these online accounts, CMS has created a new security system called Individuals Authorized Access to CMS Computer Services – Provider Community (IACS-PC).<sup>2</sup> CMS' web-based applications will be available through IACS-PC. CMS has indicated that these applications, which are to be announced in the near future, will include the "Provider Enrollment, Chain and Ownership System" and the "Provider Statistical and Reimbursement Report System."<sup>3</sup>

---

<sup>1</sup> The Medicare Learning Network (MLN) is an outreach and education effort of the Centers for Medicare and Medicaid Services. *MLN Matters* is "a series of national articles designed to inform the physician, provider, and supplier community about the latest changes to the Medicare Program." See <http://www.cms.hhs.gov/MLNMattersArticles/>.

<sup>2</sup> MLN Matters, No. SE0747, "Individuals Authorized Access to CMS Computer Services – Provider Community (IACS-PC): THE FIRST IN A SERIES OF ARTICLES", p.2, available at <http://www.cms.hhs.gov/MLNMattersArticles/downloads/SE0747.pdf> (Nov. 19, 2007) [hereinafter MLN Matters First Article].

<sup>3</sup> MLN Matters, No. SE0754, "Individuals Authorized Access to CMS Computer Services – Provider Community (IACS-PC): THE THIRD IN A SERIES OF ARTICLES ON THE IACS-PC", p. 2, available at <http://www.cms.hhs.gov/MLNMattersArticles/downloads/SE0754.pdf> (Dec. 27, 2007) [hereinafter MLN Matters Third Article].

The first step for Providers, according to CMS, is to self-register for access to IACS-PC, a process which can take "several weeks."<sup>4</sup> The registration process confirms each registrant's identity and legitimate need to access the system.<sup>5</sup> Users are grouped into two categories: individual providers; and provider organizations. For the latter, the term "organization" is defined broadly and includes physician group practices and even individual practitioners who will have their staff conduct Medicare-related transactions on their behalf. The individual practitioner category includes only those practitioners who will personally handle the online applications and have no staff who will access the applications. IACS-PC is accessible at <https://applications.cms.hhs.gov>; click on "Enter CMS Applications Portal." Detailed registration instructions are available to guide this process, and the External User Services (EUS) Help Desk will support this IACS-PC process.<sup>6</sup>

Individual practitioners need to have their social security number and correspondence information available to register. For provider organizations, the organization's taxpayer identification number, legal business name, corporate address, and IRS-issued CP-575 hard copy form (or acceptable substitute) are needed (as explained below, the organization's designated "Security Official" must be the first to register with IACS-PC).<sup>7</sup> Once registered, users receive a User ID and password; passwords expire in sixty (60) days. CMS recommends that users sign on periodically to keep passwords active; otherwise users will be prompted to create a new password to reactivate the account when signing on after 60 days of nonuse.<sup>8</sup>

CMS designed IACS-PC as a delegated authority model, and through the registration process users are assigned an appropriate role within IACS-PC. Each role within IACS-PC has different responsibilities. For provider organizations, the "Security Official" is the individual representative who first registers an organization in IACS-PC. The EUS Help Desk will approve the sole Security Official (SO), who is then trusted to approve, if the organization so chooses, one or more Backup SO(s). The SO and the Backup SO(s) are trusted with approving access for User Group Administrators (UGAs) and End Users.<sup>9</sup> Likewise, UGAs are able to approve End Users. Organizations with fewer than nine IACS-PC users must have at least the one SO and one UGA. Organizations with more than ten IACS-PC users must also have End Users. An End User can be an employee or a contractor of a Provider, and can belong to more than one user group and in more than one organization.<sup>10</sup>

CMS has also enabled Surrogate User Groups (SUGs) to register in IACS-PC. These SUGs include individuals or companies that work on behalf of one or more provider organizations (for example, clearinghouses and other independent contractors). The SO

---

<sup>4</sup> MLN Matters First Article, *supra* note 2, at 2.

<sup>5</sup> MLN Matters Third Article, *supra* note 3, at 3.

<sup>6</sup> MLN Matters First Article, *supra* note 2, at 4. The EUS Help Desk may be reached by email at [EUSsupport@cgi.com](mailto:EUSsupport@cgi.com) or by phone at 1-866-484-8049. *Id.*

<sup>7</sup> MLN Matters First Article, *supra* note 2, at 3.

<sup>8</sup> *Id.* at 4.

<sup>9</sup> *Id.* at 6-7.

<sup>10</sup> *Id.* at 7-8.

of the provider organization must approve the appropriate representative of the SUG to perform work on the provider organization's behalf.<sup>11</sup> All users of IACS-PC will have only one User ID and password, regardless of whether the user serves multiple roles within an organization or works with multiple provider organizations. All such roles will be linked to the user's one account.<sup>12</sup>

Notably, suppliers of durable medical equipment, prosthetics, orthotics and supplies (DMEPOS) should not register for access to IACS-PC at this time. CMS indicates that services to DMEPOS suppliers are not included in the forthcoming online applications.<sup>13</sup> Otherwise, it appears prudent for participating individual practitioners to register with IACS-PC and for participating provider organizations to consider which individuals should fill the roles for purposes of IACS-PC and to move forward with registering appropriately. If you have any questions about this new registration process, please contact any of the attorneys in our Health Law Practice Area listed below.

---

<sup>11</sup> *Id.* at 8.

<sup>12</sup> MLN Matters, No. SE0753, "Individuals Authorized Access to CMS Computer Services – Provider Community (IACS-PC): THE SECOND IN A SERIES OF ARTICLES ON THE IACS", p.4, available at <http://www.cms.hhs.gov/MLNMattersArticles/downloads/SE0753.pdf> (Dec. 27, 2007, updated Jan. 15, 2008).

<sup>13</sup> MLN Matters First Article, *supra* note 2, at 2.

Bass, Berry & Sims Healthcare Attorneys

**H. Stanford Adams, Jr.**

(615) 742-7775  
[sadams@bassberry.com](mailto:sadams@bassberry.com)

**Starr Brown**

(615) 742-6530  
[sbrown@bassberry.com](mailto:sbrown@bassberry.com)

**Pooneh Ghiassi**

(615) 742-7782  
[pghiassi@bassberry.com](mailto:pghiassi@bassberry.com)

**Angela Humphreys**

(615) 742-7852  
[ahumphreys@bassberry.com](mailto:ahumphreys@bassberry.com)

**Seth A. Killingbeck**

(615) 742-7707  
[skillingbeck@bassberry.com](mailto:skillingbeck@bassberry.com)

**Claire F. Miley**

(615) 742-7847  
[cmiley@bassberry.com](mailto:cmiley@bassberry.com)

**Shannon Pinkston**

(615) 742-7727  
[spinkston@bassberry.com](mailto:spinkston@bassberry.com)

**Scott B. Shanker**

(901) 543-5932  
[sshanker@bassberry.com](mailto:sshanker@bassberry.com)

**Krista L. Thornton**

(615) 742-7734  
[kthornton@bassberry.com](mailto:kthornton@bassberry.com)

**H. Lee Barfield, II**

(615) 742-6202  
[lbarfield@bassberry.com](mailto:lbarfield@bassberry.com)

**Mary Beth Fortugno**

(615) 742-7739  
[mfortugno@bassberry.com](mailto:mfortugno@bassberry.com)

**Anna Grizzle**

(615) 742-7732  
[agrizzle@bassberry.com](mailto:agrizzle@bassberry.com)

**Clevonne M. Jacobs**

(615) 742-7769  
[vjacobs@bassberry.com](mailto:vjacobs@bassberry.com)

**David King**

(615) 742-7890  
[dking@bassberry.com](mailto:dking@bassberry.com)

**T. Scott Noonan, Co-Chair**

(615) 742-6273  
[tnoonan@bassberry.com](mailto:tnoonan@bassberry.com)

**Cynthia Y. Reisz**

(615) 742-6283  
[creisz@bassberry.com](mailto:creisz@bassberry.com)

**Catherine J.B. Sloan**

(615) 742-7789  
[csloan@bassberry.com](mailto:csloan@bassberry.com)

**Leigh Walton, Co-Chair**

(615) 742-6201  
[lwalton@bassberry.com](mailto:lwalton@bassberry.com)

**Philip F. Berg**

(615) 742-7908  
[pberg@bassberry.com](mailto:pberg@bassberry.com)

**Valere B. Fulwider**

(615) 742-7742  
[vfulwider@bassberry.com](mailto:vfulwider@bassberry.com)

**Elisa E. Harris**

(615) 742-6553  
[eharris@bassberry.com](mailto:eharris@bassberry.com)

**J. James Jenkins, Jr.**

(615) 742-6236  
[jjenkins@bassberry.com](mailto:jjenkins@bassberry.com)

**Leslie Maclellan**

(615) 742-7818  
[lmaclellan@bassberry.com](mailto:lmaclellan@bassberry.com)

**Brenda N. Phillips**

(615) 742-6237  
[bnphillips@bassberry.com](mailto:bnphillips@bassberry.com)

**Brian D. Roark**

(615) 742-7753  
[broark@bassberry.com](mailto:broark@bassberry.com)

**Danielle M. Sloane**

(615) 742-7763  
[dsloane@bassberry.com](mailto:dsloane@bassberry.com)

**Elizabeth S. Warren**

(615) 742-7719  
[ewarren@bassberry.com](mailto:ewarren@bassberry.com)

*The materials contained herein have been abridged from the statutory sources and should not be construed or relied upon for legal advice. Readers are urged to consult legal counsel concerning particular situations and specific legal questions.*

*To ensure compliance with requirements imposed by the IRS, we inform you that this message is not intended to be used, and cannot be used, by the addressee or any other person for the purpose of avoiding penalties that may be imposed under the Internal Revenue Code.*

315 Deaderick Street • Suite 2700 • Nashville, TN 37238-3001 • (615) 742-6200

The Tower at Peabody Place • 100 Peabody Place, Suite 900 • Memphis, TN 38103-3672 • (901) 543-5900

1700 Riverview Tower • 900 S. Gay Street • Knoxville, TN 37902 • (865) 521-6200