



Center for Program Integrity

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To: All Medicare Advantage Organizations and Part D Sponsors

From: Zabeen Chong, Director
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Re: Provider Enrollment File

The Centers for Medicare & Medicaid Services (CMS) finalized CMS-4159-F *Medicare Program; Contract Year 2015 Policy and Technical Changes to the Medicare Advantage and the Medicare Prescription Drug Benefit Programs* on May 23, 2014. This rule requires physicians and, when applicable, other eligible professionals who write prescriptions for Part D drugs to be enrolled in Medicare in an approved status or to have a valid opt-out affidavit on file for their prescriptions to be covered under Part D. The final regulation stated that the effective date for this requirement would be June 1, 2015. However, CMS is announcing that it will delay enforcement until December 1, 2015 of the requirements in 42 CFR § 423.120(c)(6). Nevertheless, prescribers of Part D drugs must submit their Medicare enrollment applications or opt-out affidavits to their Medicare Administrative Contractors (MACs) by June 1, 2015, or earlier, to ensure that MACs have sufficient time to process the applications or opt out affidavits and avoid their patients' prescription drug claims from being denied by their Part D plans beginning December 1, 2015.

In an effort to prepare prescribers and Part D sponsors for the December 1, 2015 enforcement date, CMS is making available an enrollment file that identifies physicians and eligible professionals who are enrolled in Medicare in an approved status or have a valid opt-out affidavit on file with a MAC. The first iteration of the enrollment file is now available at <https://data.cms.gov/dataset/Medicare-Individual-Provider-List/u8u9-2upx>. The file contains production data but is considered a test file since the Part D prescriber enrollment requirement is not yet applicable. An updated enrollment file will be generated every two weeks and continue through the December 1, 2015 enforcement date.

The file displays physician and eligible professional eligibility as of and after November 1, 2014 (i.e., currently enrolled, new approvals, or changes from opt-out to enrolled as of November 1, 2014). Any periods, prior to November 1, 2014, for which a physician or eligible professional

was not enrolled in an approved or opt-out status, will not be displayed on the enrollment file. However, any periods after November 1, 2014, for which a physician or eligible professional was not enrolled in an approved or opt-out status will be on the file with its respective end dates for that given physician or eligible professional. For opted out individuals, the opt out flag will display a Y/N (Yes/No) value to indicate the periods the individual was opted out of Medicare. The file will include the individual's:

- National Provider Identifier (NPI)
- First and Last name
- Effective and End Dates
- Opt Out Flag

Example 1– Dr. John Smith's effective date of enrollment is January 1, 2014. Since he was enrolled prior to the generation of the test file, his effective date will display as November 1, 2014. Dr. Smith submits an enrollment application to voluntarily withdraw from Medicare effective December 15, 2014. Dr. Smith will appear on the applicable file as:

NPI	First Name	Last Name	Effective Date	End Date	Opt Out Flag
123456789	John	Smith	11/01/2014	12/15/2014	N

Example 2 - Dr. Mary Jones submits an affidavit to opt out of Medicare, effective December 1, 2014. Since she has opted out after the generation of the test file, her effective date will display as December 1, 2014. After the 2 year opt out period expires, Dr. Jones decides she wants to enroll in Medicare to bill, order and refer, or to write prescriptions. The enrollment application is received on January 31, 2017, so once the application is processed, the effective date of enrollment is January 1, 2017. Dr. Jones will display on the applicable file as:

NPI	First Name	Last Name	Effective Date	End Date	Opt Out Flag
987654321	Mary	Jones	12/01/2014	12/01/2016	Y
987654321	Mary	Jones	01/01/2017		N

After the enforcement date of December 1, 2015, the applicable effective dates on the file will be adjusted to December 1, 2015, and it will no longer be considered a test file. All inactive periods prior to December 1, 2015, will be removed from the file, and it will only contain active and inactive enrollment or opt out periods as of December 1, 2015 and after. The file will continue to be generated every two weeks, with a purposeful goal toward more frequent updates on a set schedule. Part D sponsors may utilize the file to determine a prescriber's Medicare enrollment or opt-out status when processing Part D pharmacy claims. The file will not validate the individual's ability to prescribe under applicable laws. Please submit questions or encounter issues accessing the file to providerenrollment@cms.hhs.gov.