

Corporate Responsibility Policy No. 8

POLICY SUBJECT:

Required Reporting of NPIs and TINs to CMS

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EFFECTIVE DATE: 12/10/14

*To be reviewed every three years
by Executive Management*

REVIEW BY: 12/08/17

POLICY

It is the policy of Catholic Health Initiatives (“CHI”) that the CHI National Office¹, any Direct Affiliates² and any Subsidiaries³ who participate in an Accountable Care Organization (ACO) [collectively referred to as “CHI Entity(ies)”] comply with regulations issued by the Center for Medicare and Medicaid Services (CMS) related to participation in the Medicare Shared Savings Program (MSSP), including those regulations related to the required reporting of NPIs and TINs.

DEFINITIONS

ACO participant - means an individual or group of Accountable Care Organization (ACO) provider(s)/supplier(s), that is identified by a Medicare-enrolled TIN, that alone or together with one or more other ACO participants comprise(s) an ACO, and that is included on the list of ACO participants that is required under 42 CFR §425.204(c)(5).

ACO provider/supplier - means an individual or entity that -- (1) is a provider (as defined at 42 CFR §400.202) or a supplier (as defined at 42 CFR §400.202); (2) is enrolled in Medicare; (3) bills for items and services it furnishes to Medicare fee-for-service beneficiaries under a Medicare billing number assigned to the TIN of an ACO participant in accordance with applicable Medicare regulations; and (4) is included on the list of ACO providers/suppliers that is required under 42 CFR §425.204(c)(5).

Primary care physician - means a physician who has a primary specialty designation of internal medicine, general practice, family practice, or geriatric medicine (or, for services furnished in an FQHC or RHC, a physician included in an attestation by the ACO as provided under 42 CFR §425.404).

PROCEDURES

Identification of Participants

As participants contractually join CHI Market ACO, staff members shall gather the necessary documentation to complete following required steps. Including but not limited to; the join/leave status, date, TIN, TIN Legal Business Name, and Medicare Enrollment TIN status.

¹ The CHI National Office includes all locations where CHI National employees are located.

² A Direct Affiliate is any corporation of which CHI is the sole corporate member or sole shareholder.

³ A Subsidiary refers to *either* an organization, whether nonprofit or for profit, in which a Direct Affiliate holds the power to appoint a majority of the voting Members of the Governing body of such organization *or* any organization in which a Subsidiary holds such power.

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Maintenance of NPI and TIN information related to Participants

CHI Market ACO shall use the *ACO Participant Template* form (found here: [ACO Participant Template Form](#)) to notify CMS of ACO participant changes.

Note: this form shall not be submitted more than once per calendar month by the last business day of the month. CHI Market ACO monthly submission should include all the changes that occurred during the past month.

Maintenance of NPI and TIN information related to Providers/Suppliers

As a provider or supplier joins the CHI Market ACO by reassigning his/her billings to a company TIN, or leaves the company by reassigning his/her billings to a non-ACO participant TIN, the provider or supplier shall update his/her PECOS enrollment within 30 days to reflect the change.

Instructions for updating PECOS are available through the CMS Web site at <https://pecos.cms.hhs.gov/pecos/login.do>

Exception; If a physician joins CHI Market ACO by reassigning his/her billings to a rural health center (RHC) or a federally-qualified health center (FQHC) that is a ACO participant, and the physician directly provides primary care services in the RHC or FQHC, in addition to the physician updating his/her enrollment status in PECOS, CHI Market ACO shall notify CMS of this change within 30 days by adding the physician's National Provider Identifier (NPI) and other information to the *ACO Participant Template* form (found here: [ACO Participant Template Form](#)).

Annual reporting of NPI and TIN information to CMS

At the beginning of the enrollment year, CHI Market ACO shall provide an annual update of NPI and TIN information to CMS as per section 425.304. CHI Market ACO shall use the *ACO Participant Template* form (found here: [ACO Participant Template Form](#)).