



**Hospice Physician and Attending Physician Enrollment in Medicare  
Frequently Asked Questions  
April 19, 2024**

- 1. What type of PECOS enrollment does a physician need to have checked in PECOS such as Home Health Agency or Hospice Agency? And if so, where can a hospice find that information? (This is the question: Do I check the hospice physician box? There is not one.)**

*There are three kinds of enrollment in PECOS, including:*

- **CMS 855I**

*Complete enrollment to treat beneficiaries and **bill and be paid by Medicare.***

- **CMS 855O**

*Credential the physician so that he/she can **order/certify Medicare covered services.***

- **Opt Out**

*Allow the physician to treat beneficiaries and bill them directly; none of the services will be payable by Medicare*

*It's not necessary for the physician to have designated "hospice" as their specialty on the [Medicare Enrollment Application: Institutional Providers \(CMS-855A\)](#) to certify hospice care. If the physician is enrolled or opted-out, they meet the new requirement regardless of their specialty listed on the CMS-855A enrollment application.*

*However, there is a column in the database that indicates "hospice."*

- 2. Do you know if Nurse Practitioners and/or Physician Assistant need to be signed into PECOS and opt in or out?**

*Both NPs and PAs can enroll in PECOS and opt in or out. However, NPs and PAs cannot certify terminal illness so their enrollment is not necessary for this regulation.*

- 3. If a physician is not enrolled, Medicare states we cannot bill, how do we proceed if the patient is a current patient?**

*The physician can be enrolled in PECOS or opt out and treat beneficiaries and bill them directly. The hospice should work with the physician to get them enrolled using the CMS 855O application, which only credentials them so that they can order and/or certify Medicare covered services or file the opt-out.*

*For the short term, you should use a Change of Attending Physician form to select a physician who is enrolled.*

- 4. Does the process change selecting the attending physician if we find out they are not enrolled?**



*As your hospice implements this new regulation, you will maintain a list of which physicians are enrolled or have a valid opt out. During the admission process, if the patient chooses a physician that has not enrolled, you may want to inform them that the physician is not enrolled in Medicare and that Medicare requires enrollment in order to be chosen as the attending.*

**5. Do we need to change to a different attending physician?**

*If the patient's attending physician is not enrolled in Medicare or has opted out, you will want to inform the patient or family that their attending physician is not enrolled and they must select a different attending physician.*

**6. Do we need to discharge the patient and readmit, if the physician is not enrolled at recert?**

*No discharge is necessary. Recertification only requires the hospice physician's signature and your hospice's policy should include mandatory enrollment in PECOS.*

**7. How do I change the physician at recertification if not enrolled? Do I ask the family or patient?**

*Recertification only requires the hospice physician and your hospice's policy should include mandatory enrollment in PECOS.*

**8. What do we do if the physician says no, I don't want to enroll?**

*Some physicians do not want to enroll in PECOS. The opt out provision is designed for that group of physicians who do not want to bill Medicare. The opt out provision allows them to treat beneficiaries and bill them directly; none of the services will be payable by Medicare.*

**9. How can we be proactive about this process with checking on patients we have on service now?**

*Hospices should verify a physician's enrollment or opt-out status using the CMS [ordering and referring data file](#) (ORDF), which lists all Medicare-enrolled and opted-out physicians. The ORDF has a separate column for hospice enrolled or opted-out physicians.*

*For attending physicians of current patients, if they elected their hospice benefits before May 1, 2024, there is no issue because this rule is not yet in effect. You may want to put together a list of attending physicians that have been named in the last 90 days or so, or pull that data from your hospice's EMR. and check enrollment status. Follow up with those physicians to encourage their enrollment or opt-out.*

**10. What are the process steps I need to know and follow.**

*Every hospice will need someone, likely the admission or intake staff, to check the enrollment status in PECOS on a regular basis. You could check for enrollment at the same time you are checking for:*



- *a valid and current medical license*
- *review any adverse actions on the license*
- *check to ensure that the name is not listed on the OIG's LEIE list.*

*It is possible that the hospice software vendor will have a process that checks the PECOS status automatically, but it is likely that the first few months, at least, will need to be done manually.*