

MEMORANDUM

CONFIDENTIALITYNOTATIONLIST

To: Part B Providers Seeking Accelerated Payments Due To Covid19 Emergency
From: Tracy M. Field
Date: April 2, 2020
Subject: Accelerated Payments

Background

With passage of the Coronavirus Aid, Relief and Economic Security (CARES) Act, providers who bill Part B – including physicians – can request “Accelerated Payments” from CMS to help alleviate the financial burdens of the emergency situation.

Just to clarify, there has been some initial confusion with the program, including whether physicians were eligible (they are) and what has to be completed in certain forms in order to apply for the funds. *Therefore, if you are using the web to search for information about the program, be certain that you have the most current information and updated forms. The first information and forms posted by Palmetto (our MAC) and CMS were replaced, and we have secured updated information to assist you in the process.*

Who Qualifies

First, all Part B providers are eligible IF

- You have billed Medicare for any claims within 180 days prior to the date you submit the form
- You are not in bankruptcy proceedings
- You are not under “active medical review or program integrity investigations”
 - o **COMMENT:** *CMS has not clarified the meaning of this provision. If you are undergoing a “routing” audit of claims, you should be able to request the funds. We will update you when/if CMS clarifies the meaning of these statements.*
- You do not have “any outstanding delinquent Medicare overpayments”
 - o **COMMENT:** *CMS has not clarified this section entirely; however, if you are repaying funds to Medicare and are making timely payments, it appears that you should qualify for the program. We will update you if/when CMS clarifies these statements.*

CMS has stated that after you submit the Request for Accelerated Payments, Palmetto will issue payments within seven calendar days of receipt. If you are paid by EFTs, then the accelerated payments will be issued via EFT.

- **COMMENT:** Palmetto and other MACs have stated that they will accept Requests on weekends as well as weekdays.

Repayment

Please be aware, at this time, CMS has informed providers who accept accelerated payments that they must repay those funds to the government. There are several issues with this aspect of the program that are not yet settled, frankly, so we are continuing to monitor how the repayment will operate. Here is what we have learned thus far:

One of the options is for Congress to pass another relief package that could eliminate any repayment obligation.

Currently, it appears that 120 days after a Part B provider receives an accelerated payment, CMS will recoup the accelerated funds from then-current Medicare payments to doctors. We understand that the recoupments will be on a dollar-for-dollar basis. If all accelerated payments are not repaid by day 210 after you receive the money, then CMS will issue a demand letter to inform you how much you owe. If you do not repay that stated total within the time specified in the demand letter, you will be assessed government interest (approximately 10.25%) on the remaining balance.

- **COMMENT:** *Palmetto has issued conflicting advice as to when the government interest rate will be applied. We believe that the information above is accurate; however, we continue to monitor Palmetto's posted guidance for information.*

Attached is a guidance for how to complete the Palmetto form. You can go to the following to get your form: [https://palmettogba.com/palmetto/Mforms.nsf/files/FN-JJ-B-2005.pdf/\\$File/FN-JJ-B-2005.pdf?Open&](https://palmettogba.com/palmetto/Mforms.nsf/files/FN-JJ-B-2005.pdf/$File/FN-JJ-B-2005.pdf?Open&)

When completed, you need to send the form via email to the following address: JJ.FINANCIALRELIEF@palmettogba.com. If you prefer, you can send the form to the following Fax number:(803) 870 – 0152.

Palmetto's COVID19 hotline number is 1-833-820-6138