

Coronavirus Update

March 28, 2020

CMS Announces Expansion of Medicare Accelerated Payment Program

Expanded eligibility during the COVID-19 emergency will allow expedited payments to Medicare providers and suppliers

Building on provisions of the Coronavirus Aid, Relief, and Economic Security (CARES) Act, the Centers for Medicare & Medicaid Services (CMS) has <u>expanded the Medicare</u> <u>accelerated payment program</u>, which is intended to provide necessary funds to providers when there is a disruption in claims submission and/or claims processing. The agency will provide accelerated or advance payments during the COVID-19 public health emergency to any Medicare provider/supplier who submits a request to the appropriate Medicare Administrative Contractor (MAC) and meets the required qualifications. The funds will be recouped by CMS after a certain timeframe.

HIGHLIGHTS OF THE ANNOUNCEMENT

Eligibility. CMS states that all Medicare providers and suppliers – including acute care hospitals, critical access hospitals (CAHs), children's hospitals, cancer hospitals, long-term care hospitals, inpatient rehabilitation hospitals, skilled nursing facilities, physicians and other Part B suppliers, and hospitals receiving periodic interim payments – are eligible to receive accelerated payments if they meet the following qualifying criteria:

- Have billed Medicare for claims within 180 days immediately prior to the date of signature on the provider's/supplier's request form;
- Are not in bankruptcy;
- Are not under active medical review or program integrity investigation; and
- Do not have any outstanding delinquent Medicare overpayments.

Amount of Payment. Qualified providers/suppliers must request a specific amount to be paid using an "Accelerated or Advance Payment Request" form provided on each MAC's website. Inpatient acute care hospitals, children's hospitals, and cancer hospitals can request up to 100%, and CAHs can request up to 125% of their historical Medicare payment amount for a six-month period. Most other providers and suppliers will be able to request up to 100% of their historical Medicare payment amount for a three-month period.

Processing Time. According to the agency, MACs will work to review and issue payments within seven calendar days of receiving the request.

Repayment. Repayment of the accelerated/advance payment begins 120 days after the date of issuance of the payment. Inpatient acute care hospitals, CAHs, children's hospitals and cancer hospitals have up to one year from the date the accelerated payment was made to repay the balance. All other Part A providers and Part B suppliers will have 210 days from the date the accelerated or advance payment was made to repay the balance.

Recoupment and Reconciliation. The provider or supplier can continue to submit claims as usual after the issuance of the accelerated or advance payment. Providers/ suppliers will receive full payment of their claims during the 120-day delay period. At the end of the 120-day period, the recoupment process will begin and every claim submitted by the provider/supplier will used to repay the accelerated/advance payment. In other words, instead of receiving payment for newly submitted claims, the provider's/supplier's outstanding accelerated/advance payment balance will be reduced by the claim payment amount. CMS states that this 100% withhold process is automatic.

For acute care hospitals, CAHs, children's hospitals, and cancer hospitals, one year after the accelerated payment issuance, the MACs will perform a manual check to determine if there is a balance remaining. If there is a balance, the MACs will send a request for repayment, which is collected by direct payment. All other Part A providers not listed above and Part B suppliers will have up to 210 days for the reconciliation process to begin. For hospitals that receive period interim payments, the accelerated payment reconciliation process will happen at the final cost report process (180 days after the fiscal year closes).

A step-by-step guide on how to request accelerated or advance payment may be found on CMS's fact sheet and on MAC websites.