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Revalidation Is Back, and So Are Enrollment Fees; Most Waivers Continue With PHE Renewal

By Nina Youngstrom

CMS on Nov. 1 will get the ball rolling on Medicare revalidations of providers and suppliers, which were put on hold last year when the COVID-19 pandemic washed over the world. Enrollment and revalidation fees also are being reinstated. This is a hint of the smattering of waivers and flexibilities that may start being reversed, even though HHS on Oct. 15 extended the COVID-19 public health emergency (PHE), which keeps waivers in place unless CMS explicitly ends them or scales them back.

CMS probably will slow roll its way to pre-COVID-19 operations and oversight, and compliance officers should “keep their eyes peeled,” said Christa Bernacchia, director of credentialing services at BerryDunn. “I think it will be sequentially peeled away,” added Cheryl Gregory, a senior manager at BerryDunn. “They are doing their best to recognize the difficulty and hardship it places on everyone to remain abreast of each of the things that are changing.”

Health care organizations should be aware that a waiver document may not be immediately updated after CMS has changed its tune on a flexibility, Bernacchia said. Case in point: the Oct. 7 updated waiver document still says revalidations are postponed.^[1] Billing privileges could be at risk.

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