

Response to the Office of Management and Budget (OMB) Comments Received for CMS-10220

The Centers for Medicare & Medicaid Services (CMS) received comments from the OMB on February 11, 2008 regarding a new information collection instrument, CMS-10220. This is the reconciliation of the comments.

OMB Comment:

OMB stated that Section 2B is confusing and requested that additional instructions be included.

Response:

The information contained in this section is system generated and pre-populated for the applicant. All that is required is a signature and date by the user group administrator. Accordingly, we do not believe that a change is necessary.

Comment:

OMB questioned how one would access the IACS.

Response:

IACS is a security system that CMS uses to control issuance of electronic identities and access to new CMS provider web-based applications. IACS is not part of Internet-based PECOS.

To directly access IACS, go to <https://applications.cms.hhs.gov> and then click on **Enter CMS Applications Portal**. We recommend that you use the reference guides as they contain detailed explanations of the role responsibilities, acceptable data formats and interpretations of error messages.

Comment:

OMB requested clarification on whether the individual's name in section 2B should be the name of the person or business that the provider is granting access.

Response:

The name in section 2B should be that of the person or business the provider is granting access. This information is system generated and pre-populated for the applicant.

Comment:

OMB requested clarification on whether an individual can have a "name" and not a "legal business name."

Response:

An individual has a Legal Name, and an organization has a Legal Business Name. An individual's Legal Name is on file with the Social Security Administration. An organization's name is on file with the Internal Revenue Service.

Comment:

OMB requested the definition of a "legal business name" and whether a legal business name would have an SSN.

Response:

A legal business name is the name that is reported to the Internal Revenue Service under which the business conducts its operations. In those cases where an individual is enrolling as a sole proprietorship, the business name would be the individual's Legal Name and the individual would file their taxes using their SSN. An organization has a Legal Business Name and uses its EIN.

Comment:

OMB requested clarification on when CMS would be creating a single security consent form.

Response:

In response to public comments, CMS reduced the number of security consent forms from four to two (one for individuals and one for organizations.) In addition, we believe that combining these forms would increase confusion.

Comment:

OMB suggested that "TIN" and "NPI" be spelled out for those who are unaware of what they stand for.

Response:

The TIN and NPI fields, within the security consent form, are pre-populated with the information previously populated. These terms are spelled out throughout the enrollment application. Given timing and programming constraints, we will incorporate this change after the implementation of Internet-based PECOS.

Comments:

OMB requested clarification on how this process would work if a private practice (independent physician) gives permission to his or her office manager and would the office manager sign under "User Group Administrator's Signature?"

Response:

An independent physician is required to complete IACS and Internet-based PECOS for themselves.

Comment:

OMB requested clarification on how the provider community would access this form.

Response:

The user successfully completes IACS registration and obtains access to Internet-based PECOS. The user would then complete all topics associated with the PECOS enrollment application and clicks the submission button the security consent form will be displayed for printing.