

21ST CENTURY CURES ACT
MID-BUILD CERTIFICATION AUDITS
FREQUENTLY ASKED QUESTIONS (FAQs)
(Revised: 6/6/2018)

1. What areas are required to be audited under the 21st Century Cures Act?

The 21st Century Cures Act requires the following areas to be audited:

- [1] Provider Attestation;
- [2] Enrollment;
- [3] Mid-Build Certification

2. Should hospitals remove the PN Modifier on claims, beginning in January 2018, if the hospital believes they meet all the requirements in the mid-build attestation certification?

Hospitals have the option of holding claims until an audit is completed or to bill with the PO modifier. This should be done if the hospital reasonably believes it has met all three requirements to be deemed excepted. Otherwise, if the hospital does NOT meet the exception criteria, or is unsure if it has a department that meets the three requirements, it should bill with the PN modifier.

3. When will the auditing of the mid-build certification begin?

The mid-build audits are scheduled to begin in January 2018 and be completed by December 2018.

4. What response / feedback will a hospital receive from their Medicare Administrative Contractor (MAC) regarding the mid-build certification?

MACs were required to acknowledge confirmation once it received a mid-build certification attestation package from a hospital. Mid-Build certifications were required to be submitted in February, 2017

5. What should a hospital do if it does not receive a confirmation from the Medicare Administrative Contractor (MAC) for a previously submitted mid-build certification attestation package?

The hospital should contact their MAC if they did not receive a confirmation.

6. What component / area in CMS is responsible for auditing of the mid-build certification?

The Centers for Medicare & Medicaid Services' (CMS) Office of Financial Management (OFM) is responsible for the audit of the mid-build certification. Cahaba Safeguard Administrators, LLC will be performing the mid-build audits for CMS

7. What role will Cahaba Safeguard Administrators, LLC, play in the mid-build audit process?

Cahaba Safeguard Administrators, LLC (CSA) will be performing the mid-build certification audits for CMS. If a Medicare hospital submitted a timely mid-build attestation certification to their MAC, the hospital will receive a determination letter from CSA with the CMS logo on the letterhead. Mid-build audit questions can be directed to CSA by email at: midbuilaudits@csallc.com.