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Sent: Friday, January 29, 2010 8:44 AM  
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Subject: FCSSO comments on CMS 588 EFT Agreement Form

FCSSO has reviewed the proposed CMS 588 EFT form and is providing comments/recommendations as noted below. We would like to thank you for the opportunity to provide feedback.

Below are our comments/recommendations:

- \* Part II - the "Changed Address" and the instructions for these lines (on page 3) may lead providers to believe this CMS-588 is all that is needed to report a change of address. We suggest removing the address lines all together (like the current form) unless the form is specific to which address should be on the form (i.e. practice address, billing address, correspondence address, etc).

- \* Part III - revise "Depository Routing Transit Number" to "Depository Electronic Routing Transit Number" or "Depository ACH Routing Transit Number"

- \* Part III - Instructions at bottom of page 1 - Add "pre-printed" in front of "voided check".

- \* Part III - Instructions at bottom of page 1 - Remove "deposit slip" as they typically are not acceptable because most do not contain the routing number.

- \* Part III - Instructions at bottom of page 1 - Revise the second sentence to be more specific that the account confirmation submitted on bank letterhead "must" (rather than "should") include the name on the account, etc. Add "and" between "bank officer's name" and "signature".

- \* Part II - Instructions on page 3, Line 1 and Line 2 - Correct the second sentence in the instructions for both lines 1 and 2 to read "the account to which EFT payments are made..."

- \* Part III instructions for line 12 on page 3 - Add the notation found for lines 1 and 2: "of the account to which EFT payments are made must exclusively bear the name of the physician..."

- \* We appreciate the removal of Section V as this section results in the majority of development for CMS 588 forms. The removal of this section will be beneficial with MAC (and other) workload implementations as 'new' EFT agreements should not be needed for an incoming contractor since the new 'Part IV' section authorizes CMS to make payments electronically as opposed to requiring a contractor name.

<<CMS-588 PRA Clearance.htm>>

Please call me if you have any questions.

Nicci Warner  
Director, Medicare Provider Enrollment

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