

Compliance Office

June 27, 2007

Ms Bonnie L. Harkless  
CMS, Office of Strategic Operations and Regulatory Affairs  
Division of Regulations Development  
Room C4-26-05  
7500 Security Boulevard  
Baltimore, Maryland 21244-1850

Dear Ms Harkless:

Wake Forest University Health Sciences (WFUHS) welcomes this opportunity to comment on the Centers for Medicare & Medicaid Services (CMS) Comment Request for Proposed Collection for the CMS-855 form (p. 26819 of the Federal Register, Vol. 72, No. 91 dated May 11, 2007). WFUHS is part of Wake Forest University Baptist Medical Center, an academic health system comprised of 1,157 acute care, psychiatric, rehabilitation and long-term care beds located in the northwestern section of North Carolina, the region's main tertiary referral center. WFUHS employs 535 physicians who are the medical school's full-time medical faculty and also serve as the attending staff of the hospital.

Last year at a WEDI conference, a representative from CMS said that once the National Plan and Provider Enumeration System data became available for lookup, that the requirement to send in a paper copy of the NPI notification to the Medicare contractors to accompany the 855 enrollment form would be dropped. Since the NPES data will shortly be available publicly, we request that this change go into effect with this revision of the 855 form.

The notification of the NPI is currently listed in Section 17 as a required supported document in the following forms:

855A p. 41  
855B p. 34  
855I p. 27  
855S p. 30

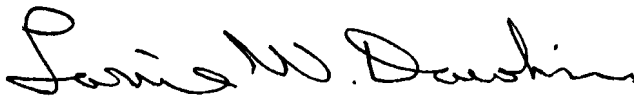
Continuing to require this document would put an unnecessary burden on providers, since the verification can be done by the contractor, possibly electronically. Any piece of paper

which can be eliminated saves time and money for all. In addition, if the provider obtained an NPI via bulk enumeration, there is no letter or email sent for that provider. That means that the provider must request a notification letter from NPPES, which is an additional burden.

Not only would dropping this requirement help providers immensely, confirmation of the NPI directly from the NPI Data Dissemination database by the contractor would be a more accurate means of verification of the NPI. There is no chance of the notification being faked.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, reading "Larrie W. Dawkins". The signature is fluid and cursive, with the first name "Larrie" being more prominent and the last name "Dawkins" following in a similar style.

Larrie W. Dawkins  
Chief Compliance Officer

C: Senator Richard Burr  
Senator Elizabeth Dole  
Representative Virginia Foxx  
Representative Mel Watt