

Medicare's Advanced Recoupments Across Tax-ID

In our <u>March White Paper</u>, we explained that Medicare would begin recouping its \$100 Billion in Accelerated and Advance Payments (AAP). If you opted to take the advance payment, the repayment process might have already started. Your Remittance Advice (RA) will show the deduction amount based on the affiliated taxpayer identification number (TIN) regardless of which PTAN received the payment.

To check on your current repayment status, log into the NGSConnex Portal. To register, please click this <u>LINK</u>, click I agree and follow the steps. Once you are registered, you will need to follow the steps for Medicare providers <u>HERE</u>. There is no charge to register for access to the NGSConnex portal.

If, prior to the Accelerated and Advance Payments (AAP) you had other deductions taken out by Medicare, those will still be taken out on top of the AAP. Listed below are examples of deductions with the AAP repayment. If you did not partake in the Accelerated and Advance Payment or have already paid it back, then the below will not apply.

- **COVID-19 AAP deductions are taken last**: Your 25% AAP repayments are based off your total Remittance Advice (RA) amount. If you have an Extended Repayment Schedule (ERS), the monthly payment deduction will be taken out of your RA prior to your AAP repayment.
 - For example, if the provider is scheduled to receive a payment of \$100 on their Remittance Advice and they have an ERS set up for \$50, the AAP recoupment will be 25% of the \$100 RA amount "owed" to the provider. Therefore, the AAP recoupment amount will be \$25 and will be deducted after the ERS payment of \$50, leaving the final net payment for the RA to be \$25.
- If you received multiple COVID-19 AAPs: If one PTAN received two COVID-19 AAPs, your repayment will still be 25% of the Remittance Advice. The difference is that 12.5% will be applied to each AAP that was taken.
 - For example, the provider received two COVID-19 AAPs, one on 3/31 and one on 4/30.
 The recoupment will be 25% for each RA from 3/31-4/29 to be applied to the first AAP.
 On 4/30, they will now have two AAP deductions on their RAs. Both will be 12.5%.
 - The percentage is split by the number of AAPs. Therefore, if there were four AAPs for one PTAN, the four AAP repayments will be 6.25% on each RA (totaling 25%).
- Affiliated providers: Any related provider with the same Tax ID to the PTAN that received the AAP will each offset 25% of the total RA amount. Any affiliate PTANs will offset 25% of their remaining amount on their RA after any ERS offsets are made. CMS is looking at the Tax ID to get the recoupment from the advanced payment regardless of which PTAN received the payment.

If you are part of a group, you did not receive an AAP, and you see the recoupment on your remittance advice; reach out to your other group providers to determine which PTAN received the AAP. If you have any questions, please contact your Practice Manager.