

**Case Study:**

# CMS Multi-Factor Authentication Usage Policy

Process Improvements to  
Maximize Reimbursement



# Zotec Partners considers data security a mission-critical, strategic priority utilizing a three-part strategy:



01 Organizational  
Commitment



02 Technology  
and Processes



03 External  
Certification

We understand that having an additional Multi-Factor Authentication (MFA) layer of security protects login information from being shared and greatly minimizes data security issues. Because of this, we were able to get ahead of the curve in reviewing the process and pressure-testing CMS' new MFA usage policy in September 2019, affecting PECOS, Identity & Access Management (I&A), NPPES and HITECH logins.



Zotec's first-hand experience in performing enrollment is typical of the industry standard for third parties. With multiple business associate agreements in place using provider or client credentials, Zotec regularly performs PECOS enrollment. Always on the forefront of process and innovation, Zotec's provider enrollment team had already begun testing the new CMS processes and implementation around MFA to prevent logins from being disclosed or shared.

# Getting Clarity Ahead of the Curve

Zotec had already established MFA processes for customers, with regular maintenance and updates in compliance with CMS. Upon reviewing the new CMS policy, however, Zotec's provider enrollment team immediately identified problems within the process layout. It was clear that the necessary outreach and education around the new CMS process fell short, when CMS assumed providers had a full understanding of how the I&A connections should be established.

Using the power of Zotec's Political Action Committee (ZPAC), the team advised that if CMS chose to move ahead with its current policy, the provider enrollment community would suffer a negative, long-term impact on revenue and delays in reimbursement.

To clarify the issues we uncovered, ZPAC reached directly into The CMS and explained that the provider enrollment was not performed as originally thought, based on the processes laid out in the new policy. Our reasoning to the CMS was simple: if our large, experienced organization isn't fully prepared for the new MFA rollout, then it is likely that many others are also not prepared.



## Impacting Change at High Levels

ZPAC and Zotec's provider enrollment team worked directly with CMS to review the proposed changes and layout specific concerns regarding the proposed PECOS MFA process. We were able to explain how the enrollment process is operating from a large-scale perspective, noting that a large majority of enrollments are performed by third party organizations. The MFA rollout would negatively affect third parties since CMS continues to build out their processes based on the thought that providers are directly performing their own enrollment. While ZPAC remains in agreement with CMS compliance initiatives, it is advocating for more training and education before those are enforced.



# Outcomes in Data Security and Reimbursement

As a direct result of the discussions ZPAC had with CMS, and the problems we identified in the process, CMS decided to delay the PECOS MFA rollout for a year.

By advocating for a delay in the policy, ZPAC was able to:



**a.**

Successfully prevent the provider enrollment community and third party organizations from being locked out of using PECOS and reverting to paper enrollment applications.



**b.**

Highlight the need for a more thoughtful and detailed process before this rollout is performed.



**c.**

Encourage provider education around this topic so that they will be better prepared to act before the new deadline.



**d.**

Connect the paperless and provider/patient care initiatives being set by CMS Director Seema Verma to the PECOS MFA rollout, aligning those goals with the new MFA policy execution.

We continue to meet with CMS once a month to be a voice in this area and have a seat at the table providing first-hand perspective about provider enrollment challenges and ideas.

# Timeline



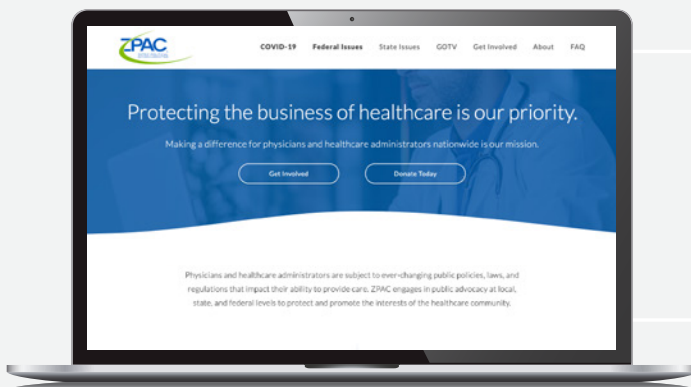




ZPAC makes it a priority to protect the business of healthcare, and our recent work with CMS proves we are a leader in compliance, reforms, and education for the provider community, setting an industry standard of excellence. The changes to the Multi-Factor Authentication usage policy will have a positive and lasting effect on provider reimbursement across the U.S.

For information on MFA usage policy update, visit the I&A website at:

<https://nppes.cms.hhs.gov/IAWeb/warning.do>



To help ZPAC engage in public advocacy that makes a difference for physicians and healthcare administrators nationwide, become an advocate at:

[www.zotecpac.com](http://www.zotecpac.com)