




# MEDICAL ASSISTANCE BULLETIN

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF PUBLIC WELFARE

ISSUE DATE December 16, 2005	EFFECTIVE DATE December 16, 2005	NUMBER 09-05-16
SUBJECT Clarification of Enrollment Policy for CRNPs	BY  James L. Hardy, Acting Deputy Secretary Office of Medical Assistance Programs	

## PURPOSE:

The purpose of this bulletin is to clarify the Pennsylvania Medical Assistance (MA) Program's enrollment policy for Certified Registered Nurse Practitioners (CRNP).

## SCOPE:

This bulletin applies to all CRNPs requesting enrollment in the MA Program to render services to MA recipients in the ACCESS Plus or mandatory (HealthChoices) or voluntary managed care delivery systems.

## BACKGROUND/DISCUSSION:

Effective July 1, 1990, the Department of Public Welfare (Department) began to enroll CRNPs in the MA Program who were not employed by or under contract to a medical service provider or practitioner to provide and receive payment for medically necessary services provided to eligible MA recipients. However, the Department did not permit CRNPs employed by or under contract to a medical service provider or practitioner to enroll in the MA Program or to directly receive payments for medically necessary services provided.

This position is based on the MA Regulation set forth at 55 Pa.Code § 1144.52 (1) which states that a CRNP cannot receive payment for services when the CRNP has a financial arrangement to provide services as an employee of or under contract to an enrolled medical service provider or practitioner. For the CRNP employed by or under contract to an enrolled medical service provider or practitioner, the Department recognizes the CRNP's services, but pays the enrolled practitioner or medical service provider for whom the CRNP works. In those situations where the CRNP is employed by a hospital, the employer is the enrolled hospital provider and payment for services provided by the CRNP is made to the hospital.

In response to discussions with CRNPs, the Department has revisited this issue and is providing the following clarification of the policy under which a CRNP, who is licensed and currently certified by the State Board of Nursing, may enroll in the MA Program.

COMMENTS AND QUESTIONS REGARDING THIS BULLETIN SHOULD BE DIRECTED TO:

The appropriate toll-free number for your provider type.

Visit the Office of Medical Assistance Programs website at [www.dpw.state.pa.us/omap](http://www.dpw.state.pa.us/omap)

## General MA Enrollment Policy for CRNPs:

- CRNPs, who are **not** employed by or under contract to a medical service provider or practitioner, may be enrolled in the MA Program and may bill the Department for medically necessary MA covered services permitted under their scope of practice and included on the MA Program Fee Schedule.
- CRNPs who are employed with an incorporated group CRNP practice may enroll in the MA Program. The MA Program will individually enroll each CRNP and identify them as a member of the group practice. The CRNP rendering the service may bill the Department for medically necessary MA covered services permitted under his/her scope of practice and included on the MA Program Fee Schedule. If upon enrollment the CRNP requests a fee assignment on his/her enrollment file, the Department will list the CRNP group practice as the “pay to” address. Payment will be made to the CRNP group not the individual CRNP.
- CRNPs employed by or under contract to an enrolled medical service provider or practitioner may enroll in the MA Program to receive an MA provider number but may **not** bill the Department. The Department recognizes the CRNP’s services, but reimburses the enrolled practitioner or medical services provider for whom the CRNP works.

**NOTE: 55 Pa.Code, Chapter 1144 Certified Registered Nurse Practitioner Services, Section 1144.53 related to Noncompensable services sets forth that payment will not be made for services and procedures furnished by the CRNP for which payment is made to an enrolled medical service provider or practitioner.**

In order to enroll under the Fee-for-Service (FFS) delivery system, CRNPs may contact the Department at 1-717-772-6140 (Bureau of Fee-for-Service Provider Enrollment Line) or CRNPs may access the OMAP Provider Enrollment Website at <http://www.dpw.state.pa.us/omap/promise/enroll/omappromiseenroll.asp> in order to obtain an MA Provider Enrollment Application.

## CRNP Enrollment as an ACCESS Plus Primary Care Provider (PCP):

Additionally, the Department is providing information related to CRNP enrollment as a Primary Care Provider (PCP) under the ACCESS Plus Program as follows:

- CRNPs, who are **not** employed by or under contract to a medical service provider or practitioner, and who are enrolled in the MA Program may become a PCP under the ACCESS Plus Program. In order to become an ACCESS Plus PCP, the CRNP will be required to sign and submit an ACCESS Plus Supplemental Agreement. MA enrolled CRNPs, who are **not** employed by or under contract to a medical service provider or practitioner, and are enrolled under the ACCESS Plus Program as a PCP will be subject to the ACCESS Plus PCP credentialing and recredentialing requirements.

- CRNPs employed by or under contract to an enrolled medical service provider or practitioner may enroll in the ACCESS Plus Program to receive an MA provider number but may **not** bill the Department. In these types of arrangements, the CRNP can be identified as an ACCESS Plus PCP; however, payment is still made to the medical service providers for whom the CRNP works. The Department recognizes the CRNP's services, but reimburses the enrolled practitioner or medical services provider for whom the CRNP works.

Additionally, the Department is providing the following website links of notification letters sent to providers regarding ACCESS Plus enrollment:

<http://www.dpw.state.pa.us/omap/promise/enroll/omappromiseenroll.asp> (link for ACCESS Plus Enrollment);

[http://www.dpw.state.pa.us/Resources/Documents/Pdf/Publications/AccessPlus\\_ProvAgree.pdf](http://www.dpw.state.pa.us/Resources/Documents/Pdf/Publications/AccessPlus_ProvAgree.pdf) (link for ACCESS Plus Supplemental Application);

[http://www.dpw.state.pa.us/Resources/Documents/Pdf/Publications/AccessPlus\\_ProvNotice.pdf](http://www.dpw.state.pa.us/Resources/Documents/Pdf/Publications/AccessPlus_ProvNotice.pdf) (ACCESS Plus Provider Notice); and

[http://www.dpw.state.pa.us/Resources/Documents/Pdf/Publications/AccessPlus\\_ProvCoverltr.pdf](http://www.dpw.state.pa.us/Resources/Documents/Pdf/Publications/AccessPlus_ProvCoverltr.pdf) (ACCESS Plus Provider Cover Letter).

#### CRNP Enrollment as a MCO PCP:

The Pennsylvania Department of Health's (DOH) HMO Technical Advisory #95-1, "Exemption Request for CRNPs to Serve as Primary Care Providers" provides guidance to MCOs who wish to enter into PCP contracts with practices in which CRNPs provide the majority of the primary care services and serve in the PCP role. A copy of this Technical Advisory can be obtained from the DOH, Bureau of Health Care Financing. The DOH requires the HealthChoices (Pennsylvania's 1915 (b) waiver program to provide mandatory managed health care to MA recipients) MCOs to ensure that their internal credentialing processes incorporate the minimum requirements outlined in the Technical Advisory and their credentialing processes are approved by the Department.

- CRNPs who wish to function as PCPs in HealthChoices must contact the MCO's Provider Services Department to request an application for credentialing and enrollment. The MCO will determine the need for a CRNP to serve as a PCP in the network. If the MCO determines a need for a CRNP to serve as a PCP and the CRNP meets the MCO's credentialing and enrollment requirements, the MCO will forward the enrollment application to the MA Program for processing. This will enable the Department to issue the CRNP a PROMISE™ Provider Identification number.

Finally, CRNPs are reminded of the requirements set forth in MA Bulletin 99-03-06, titled "Pharmaceutical Services Prescribed and/or Dispensed by a Certified Registered Nurse Practitioner (CRNP)" issued and effective May 12, 2003, that addresses pharmaceutical services prescribed and/or dispensed by a CRNP in the FFS delivery system. A CRNP may prescribe and dispense a drug relevant to the area of practice of the CRNP if that authorization is documented in the collaborative agreement.