

To: **PerformCare Provider Network: Licensed Outpatient Clinics, Partial Hospitalizations, and additional licensed facilities**

From: **Scott Daubert PhD, VP Operations**

Date: **June 1, 2017**

Subject: **PC-19 Medicaid Enrollment of Ordering, Referring and Prescribing Providers**

Claims Payment and Clinical Policy Clarification

Question/Issue:

Should psychiatrists, psychologists, Certified Registered Nurse Practitioners (CRNP), Physician Assistants (PA) and other licensed practitioners working solely within licensed programs (e.g., Mental Health Outpatient Clinics, Partial Hospitalization programs) be individually enrolled in Medicaid with their own PROMISE™ number?

Source Documentation / References:

Medical Assistance Bulletin 99-16-07 Enrollment of Ordering, Referring and Prescribing Providers, Issue Date April 1, 2016.

Medical Assistance Bulletin 99-17-02 Submission of Claims that Require the National Provider Identifier (NPI) of a Medical Assistance enrolled Ordering, Referring or Prescribing Provider, Issue Date January 30, 2017.

42 CFR §455.410 Enrollment and screening of providers.

Pennsylvania PROMISE™ Provider Handbooks

Background:

The federal Affordable Care Act (ACA) added requirements for provider screening and enrollment, including a requirement that states require physicians and other practitioners who order or refer items or services for Medical Assistance (MA) beneficiaries to enroll as MA providers. The federal Department of Health and Human Services regulation implementing this requirement can be found at 42 CFR § 455.410. MA Bulletin 99-16-07 implemented this requirement for all providers who order, refer, prescribe or render services to MA beneficiaries effective April 1, 2016. However, the scope of 99-16-07 was limited to the Fee-for-Service (FFS) delivery system and not the HealthChoices managed care programs for physical health and behavioral health. The requirement was further detailed in MA Bulletin 99-17-02, issued January 30, 2017. The purpose of this bulletin was to provide further information about the provider types and services that require a National Provider Identifier (NPI) of an ordering or prescribing provider who is enrolled in the Assistance (MA) Program in order to obtain payment. Again, the scope was still limited to the Fee-for-Service (FFS) delivery system. Billing providers were directed to check the PROMISE™ provider billing guides to determine if claims for services submitted by their provider type and specialty combination require a MA enrolled ordering or prescribing provider's NPI on any Fee-for-Service claim.

PerformCare Answer/Response:

Historically, PerformCare has not required that psychiatrists, psychologists, CRNP's and other licensed practitioners working solely within licensed programs (e.g., Mental Health Outpatient Clinics, Partial Hospitalization programs) be individually enrolled in Medicaid with their own PROMISe™ number. Furthermore, individual credentialing with PerformCare was not required in this situation.

However, it is clear that the requirements for enrollment of ordering, referring and prescribing providers will be applied to the physical health and behavioral health managed care programs by January 1, 2018 at the latest. While PerformCare has not yet been formally notified by the Office of Mental Health and Substance Abuse Services (OMHSAS), providers should begin to prepare now.

At this time, we are strongly recommending that at a minimum all mental health outpatient clinics and partial hospitalization programs evaluate the MA enrollment status of employed and contracted psychiatrists (including locum tenens and telepsychiatry), psychologists, CRNP's, and PA's. If you have psychiatrists, psychologists, CRNP's and PA's on staff or under contract who do not have an active individual MA enrollment, you should begin the process as soon as possible.

As an agency, your first step will likely be to determine if your employed and contracted staff have a current individual MA enrollment. As billing providers, you may check the Provider Portal Lookup Function in PROMISe™ to determine if these prescribing providers are enrolled in the MA program. The Provider Portal Lookup Function can be accessed after a MA enrolled provider has logged into PROMISe™. You can access this at the following link:

<https://promise.dpw.state.pa.us/portal/Default.aspx?alias=promise.dpw.state.pa.us/portal/provider>

Enrollment applications may be found at:

http://www.dhs.pa.gov/provider/promise/enrollmentinformation/S_001994

PerformCare will provide additional information and detail as it becomes available from OMHSAS. Please note that while MA enrollment is required, individual credentialing guidelines with PerformCare remain as is and will not be a requirement for such individuals working solely for a licensed facility and facility billing entity.

cc: PerformCare Managers and Account Executives

Tia Mann, Behavioral Health Services of Somerset and Bedford Counties

Missy Reisinger, Tuscarora Managed Care Alliance, Franklin / Fulton Counties

Scott Suhring, Capital Area Behavioral Health Collaborative