MassHealth Provider Services Updates

April 2016
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Agenda

- Ordering, Referring and Prescribing Background and Implementation Strategy
- Mid Level Provider Types
- Questions
Ordering, Referring and Prescribing Requirements
Ordering, Referring and Prescribing (ORP) Requirements

Background

- ACA Section 6401 (b)

- States must require:
  - All ordering or referring physicians and other professionals be enrolled under the State [Medicaid] Plan…as a participating provider; and
  - The NPI of any ordering or referring physician or other professional…be specified on any claim for payment that is based on an order or referral of the physician or other professional.

- These requirements were effective March 25, 2011. Final Rule (42 CFR 455.410(b) and 42 CDR 455.440) was published in the Federal Register on Feb. 2, 2011. Subregulatory guidance was given to states on December 23, 2011.

- MassHealth is continuing its implementation efforts. In March 2016 we began providing informational messaging on certain impacted claims.
MassHealth Services that require an Order, Referral or Prescription

The following services and supplies require an order, referral, or prescription from a provider in order for the billing provider to receive MassHealth payment.

<table>
<thead>
<tr>
<th>Service</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Any service that requires a PCC referral</td>
<td>Labs and Diagnostic Tests</td>
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<tr>
<td>Adult Day Health</td>
<td>Medications</td>
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<tr>
<td>Adult Foster Care</td>
<td>Orthotics</td>
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<tr>
<td>DME</td>
<td>Oxygen/Respiratory Equipment</td>
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<tr>
<td>Eyeglasses</td>
<td>Personal Care Attendant</td>
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<td>Group Adult Foster Care</td>
<td>Prosthetics</td>
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<tr>
<td>Home Health</td>
<td>Psychological Testing</td>
</tr>
<tr>
<td>Independent Living</td>
<td>Therapy (PT, OT, ST)</td>
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<tr>
<td>Independent Nurse</td>
<td>Transitional Living</td>
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</tbody>
</table>
Provider Types Authorized to Order, Refer or Prescribe

The following types of providers are the only provider types that may be listed on a claim as the ordering, referring, or prescribing provider and are referred to in this bulletin as authorized ORP providers. Interns, residents, and other trainees in the provider types listed below who are authorized to order, refer, or prescribe services are also considered ORP providers.

| Certified Nurse Midwife                      | Pharmacist (if authorized to prescribe) |
| Certified Registered Nurse Anesthetist        | Physician                               |
| Clinical Nurse Specialist                    | Physician Assistant                     |
| Dentist                                      | Podiatrist                              |
| Licensed Independent Clinical Social Worker  | Psychiatric Clinical Nurse Specialist   |
| Nurse Practitioner                           | Psychologist                            |
| Optometrist                                  |                                          |
Enrollment for ORP Requirements

- State law (Chapter 118 of the Acts of 2012 and Chapter 10 of the Acts of 2015) requires that these provider types must apply to enroll with MassHealth for at least the purposes of ORP (i.e., at least as a nonbilling provider) in order to obtain and maintain state licensure. This law will go into effect upon promulgation of MassHealth enrollment regulations, scheduled for later in 2016.

- State law also requires that providers must apply to enroll with MassHealth for at least the purposes of ORP (i.e., at least as a nonbilling provider) to be included in private insurance provider networks so we will also be coordinating with the Division of Insurance on enforcement of that requirement.

- All provider types listed on Slide 6 must apply to enroll with MassHealth, at least as a nonbilling provider, regardless of practice location (private practice, hospital, CHC, CMHC, etc.) The legislation applies to physician interns and residents but not other types of interns and residents.
Enrollment for ORP Requirements (cont.)

- ORP nonbilling providers will not be required to provide services to MassHealth members.
- MassHealth developed a streamlined enrollment process for “ORP nonbilling only” providers.
- Fillable nonbilling provider applications and contracts are available on the MassHealth website:
  
  http://www.mass.gov/eohhs/provider/insurance/masshealth/aca/aca-section-6401enrollment-information.html

- MassHealth has developed an outreach strategy to providers currently not participating in MassHealth to inform them of this requirement.
Claims Impact- Phased Approach

- MassHealth is implementing the ORP requirements in several phases.
- Phase 1 – Informational Messaging (Dates of Service on or after March 7, 2016).
  - Claims that do not meet the ORP requirements will be payable but will also include applicable informational messages to allow providers time to understand the scenarios in which an authorized ORP provider’s NPI is required.
- Phase 2 – Claim Denials – the types of claims in Phase 1 will deny when they do not meet the ORP requirements (date TBD).
  - In addition, all claims from any billing provider that are processed by the Pharmacy Online Processing System (POPS) that do not meet the ORP requirements will deny.
- Phase 3 - at a later date, in Phase 3, claims from institutional and facility providers will deny if they do not meet ORP requirements.
- Refer to: MassHealth All Provider Bulletin 259 (2/16) for details on ORP requirements.
ORP Requirements

- Next Steps
  - Providers that order, refer or prescribe services for MassHealth members will need to include their NPI on and written orders, referrals and prescriptions.
  - MassHealth is updating the process for entity PCC referrals to ensure they meet the ORP requirements.
  - MassHealth is updating the PCC Referral letter to include the NPI of the referring provider.
  - MassHealth is developing (production date TBD) a searchable database of MassHealth enrolled providers.
Mid-Level Provider Types
New Mid- Level Provider Types

Regulations are still being finalized but in 2016 the following Provider Types will be required to enroll as MassHealth providers:

- Newly eligible to enroll:
  - Physician Assistants (PA)
  - Certified Registered Nurse Anesthetists (CRNA)
  - Clinical Nurse Specialist (CNS)
  - Psychiatric Clinical Nurse Specialist (PCNS)

- Change in eligibility requirements:
  - Nurse Midwife
  - Nurse Practitioner
Questions?