## Re: UPDATE - Please Note - Referring, Ordering, Prescribing and Attending Provider Requirements



Lori Petre <lori.petre@azahcccs.gov>

Mon, Oct 19, 4:56 PM (2 days ago)

to (CRF), (SHCA), CMDP, Kellie, Bernadette, Patricia, Reyna, Rodd, Ryan, Lynn, Sherry, Alexa, (

My apologies for the delay in getting out the additional promised updates as outlined below.

Please review and let us know if you have additional questions. We will also be reviewing both the Q&A log and the exception process for Pharmacists, Residents and Interns at our technical meeting later in the week. Thanks!

First, attached please find the most current Q&A log of questions submitted by the MCO's.

- Please review, and let us know if you have additional questions.
- Of particular note is a clarification related to an identified exception and related processing for those provider types not registerable with AHCCCS (Pharmacists, Residents and Interns) and how AHCCCS intends to handle these exceptions (I will be sending an overview of this process out as a supplement to this email no later than Thursday 10/1). - High level overview and workflow attached.
- There are a few questions that remain outstanding and I am following up with subject matter experts within the team for responses. - Updated Q&A matrix attached.

On Mon, Sep 28, 2020 at 3:36 PM Lori Petre <<u>lori.petre@azahcccs.gov</u>> wrote:

Just wanted to provide a few updates and thank you all for your continued attention to this important project.

First, attached please find the most current Q&A log of questions submitted by the MCO's.

- Please review, and let us know if you have additional questions.
- Of particular note is a clarification related to an identified exception and related processing for those provider types not registerable with AHCCCS (Pharmacists, Residents and Interns) and how AHCCCS intends to handle these exceptions (I will be sending an overview of this process out as a supplement to this email no later than Thursday 10/1).
- There are a few questions that remain outstanding and I am following up with subject matter experts within the team for responses.

Second, we've run data based on submitted encounters and FFS claims of how many total provider NPI's found as a ROPA in encounters or claims but not found as an AHCCCS registered NPI.

- Overall (unduplicated) counts are below (please note these counts at this time would include both encounters and FFS claims).
- We can provide MCO specific counts and related NPI's which were not found, if you would find this information helpful please let me know.
- I've also noted how many of these overall counts across both years were identified as Pharmacists, Residents and Interns that would fall under the above noted exception processing.

2019 Dates of Service -4,769 Referring/Ordering/Attending 18,878 Prescribing

2020 Dates of Service -3,735 Referring/Ordering/Attending 12,763 Prescribing

98 Pharmacists and 1,175 Residents or Interns - Referring/Ordering/Attending 3,141 Pharmacists and 2,696 Residents and Interns - Prescribing And finally a reminder that AHCCCS continues to post and refine communications for providers at the following link.

https://www.azahcccs.gov/PlansProviders/NewProviders/ROPA.html

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## Lori Petre <<u>lori.petre@azahcccs.gov</u>>

Mon, Jun 15, 3:07 PM

to (CRF), (SHCA), CMDP, Joel, Kellie, Molly, Bernadette, Patricia, Rodd, Ryan, Carlos, Lynn, She

## Per 42 CFR 455.410 of the Affordable Care Act, the State Medicaid agency

(AHCCCS) From: Lori Petre <<u>lori.petre@azahcccs.gov</u>>

Sent: Wednesday, June 17, 2020 4:23 PM

To: (CRF) Mike Ferguson <<u>MFerguson@care1staz.com</u>>; (SHCA) Amanda Pizzolanti <<u>amanda.pizzolanti@healthchoiceaz.com</u>>; CMDP Jason Winfrey <<u>jason.winfrey@azdcs.gov</u>>; Joel Conger <<u>jrconger@magellanhealth.com</u>>; Manders, Kellie <<u>mandersk@mercycareaz.org</u>>; Molly Corrigan <<u>corriganm@magellanhealth.com</u>>; Moreno, Bernadette R <<u>MorenoB@mercycareaz.org</u>>; Patricia Gilman <<u>patricia.gilman@uhc.com</u>>; Rodd J. Mas <<u>rodd.j.mas@azcompletehealth.com</u>>; Ryan Thomsen <<u>Ryan.Thomsen@bannerhealth.com</u>>; Carlos Reynoso (UHC LTC) <<u>carlos\_reynoso@uhc.com</u>>; Lynn Lingwell (DDD) <<u>clingwall@azdes.gov</u>>; Sherry Wince (DDD) <<u>swince@azdes.gov</u>> Cc: Quast, Christina <<u>Christina.Quast@azahcccs.gov</u>>; Nieder, Julie <<u>julie.nieder@azahcccs.gov</u>>; Aker, Gina <<u>gina.aker@azahcccs.gov</u>>; Rudnick, David <<u>david.rudnick@azahcccs.gov</u>>; Kaumaya, Alexa <<u>alexa.kaumaya@azahcccs.gov</u>> Subject: [EXTERNAL] Re: Please Note - Referring, Ordering, Prescribing and Attending Provider Requirements

\*\*\*\* External Email - Use Caution \*\*\*\* Clarified cite (removing the prior first paragraph) as to match the webpage posting. Any questions let us know. Thanks!

The <u>Patient Protection and Affordable Care Act (ACA)</u> and the <u>21st Century Cures Act</u> (<u>Cures</u>) require that all health care providers who provide services to, order (refer), prescribe, or certify health care services for AHCCCS members must be enrolled as an AHCCCS provider.

Until these Acts passed, referring, ordering, prescribing and attending providers were required to obtain a National Provider Identifiers (NPI's) but were not required to be enrolled as an AHCCCS provider.

After Jan. 1, 2021 claims which include referring, ordering, prescribing or attending providers who are not enrolled with AHCCCS will not be reimbursed. AHCCCS encourages all providers who are not currently registered with AHCCCS, but who are referring, ordering, prescribing or attending providers, to register as an AHCCCS provider as soon as possible. Service providers whose claims include referring, ordering, prescribing or attending providers who are not registered with AHCCCS should work with these providers to complete their registration.

<u>On and after January 1st, 2021,</u> if a prescribing, ordering, referring or attending provider is reported on a claim or encounter they must be a valid and active AHCCCS registered provider, or the rendering/service providers claim should not be paid.

To ensure payment of claims when submitting for items and/or services attended, ordered, referred, or prescribed by another provider, the rendering provider must ensure that the ordering/referring/prescribing provider is actively registered with AHCCCS.

A provider who chooses to attend, order, refer, or prescribe items and/or services for AHCCCS members, but who chooses not to submit claims to AHCCCS directly, must still be registered with AHCCCS to ensure payment of those items and/or services where he attended, ordered, referred or prescribed.

To facilitate communication as to these requirements and provide related guidance AHCCCS has developed and posted the FAQ's outlined below. https://www.azahcccs.gov/PlansProviders/NewProviders/ROPA.html

AHCCCS MCO's are instructed to share this guidance with their provider Networks and work to implement these requirements within their processing systems by the January 1, 2021 date.

Please let us know if you have questions. Thank you.

Please let us know if you have questions. Thank you. **2 Attachments**