

Commonwealth of Massachusetts Executive Office of Health and Human Services Office of Medicaid

www.mass.gov/masshealth

MassHealth All-Provider Bulletin 268 May 2017

TO: All Providers Participating in MassHealth

FROM: Daniel Tsai, Assistant Secretary for MassHealth

RE: Changes to Primary Care Clinician (PCC) Provider Online Service

Center (POSC) Referrals Process for PCCs that are Organizations,

Including Group Practices

This bulletin supersedes All Provider Bulletin 265 (March 2017).

The changes to the Primary Care Clinician (PCC) Plan Provider Online Service Center (POSC) referrals process described in this Bulletin will result in identification of an Individual Referring Provider in all PCC referrals. Identification of an Individual Referring Provider on all PCC referrals is a necessary step toward MassHealth implementation of the ordering, referring and prescribing requirements described below. Full implementation of the ordering, referring and prescribing requirements through claims denials will occur at a future date. MassHealth will issue subsequent communication to providers at that time.

Background

As described in <u>All Provider Bulletin 259</u>, Section 6401(b) of the Affordable Care Act includes requirements related to ordering, referring, and prescribing (ORP) providers. If MassHealth requires a service to be ordered, referred, or prescribed, then ACA Section 6401(b) requires that:

- 1. the billing provider include the ORP provider's national provider identifier (NPI) on the claim;
- 2. the ORP provider be enrolled with MassHealth as a fully participating *individual* provider or as a nonbilling *individual* provider.

Under these ORP requirements, claims for any service requiring a PCC referral must include the NPI of the individual referring provider in the referral loop of the electronic claim.

PCC Providers

Members enrolled in the PCC Plan select, or are assigned to, a PCC at a PCC entity/service location (SL). Individual physicians, independent nurse practitioners, and the following types of organizations may become PCC Plan providers: community health centers (CHCs), hospital-licensed health centers (HLHCs), hospital outpatient departments (OPDs), and group practices, including similar organizations operated by Indian Health Services (IHS).

New Requirement for PCC Referrals from PCC Organizations, Including Group Practices

Currently, the PCC entity/SL is listed as the referring provider on a PCC referral in all cases. As of June 19, 2017, PCCs that are CHCs, HLHCs, OPDs, IHS, and group practices must now also identify an *individual* MassHealth-participating physician or nurse practitioner as the Individual Referring Provider.

In order to qualify as an Individual Referring Provider for this process, the physician or nurse practitioner must be

- (1) on-staff at the CHC, HLHC, OPD, IHS or group practice PCC entity/SL
- (2) board certified or board eligible (or in the case of a nurse practitioner, specialize) in family practice, pediatrics, internal medicine, obstetrics, or gynecology,
- (3) identified to MassHealth by the CHC, HLHC, OPD, IHS, or group practice as a provider who may be assigned PCC Plan members pursuant to 130 CMR 450.118(C), (D), or (E), as applicable, and
- (4) individually enrolled with MassHealth as a non-billing ORP provider if on-staff at a CHC, HLHC, OPD, or IHS, or as a fully-participating provider if on-staff at a group practice.

PCC Referral Instructions for PCC Organizations, Including Group Practices

The PCC would continue to be listed as the "Referring Provider" as usual. The POSC referral information panel has been updated so that a CHC, HLHC, OPD, IHS, or group practice PCC entity/SL must now also choose an individual referring physician or nurse practitioner that meets the four qualifications above, using the "Individual Referring Provider" search tool. As of June 19, 2017, if the organizational PCC does not enter a qualifying Individual Referring Provider, an error message will occur and the referral will not be processed.

Note that the individual providers that are returned in the Individual Referring Provider search tool include *all* active MassHealth providers, and not just those who meet the four qualifications above. Therefore, please be sure to choose an individual provider who meets the four qualifications above in order for the PCC referral to process and to avoid an error message.

Please note that the Individual Referring Provider field on the POSC Referral Information panel is *not required* for individual physicians or independent nurse practitioners who contract directly with MassHealth as PCCs. If an individual physician or an independent nurse practitioner contracting directly with MassHealth as a PCC selects an "Individual Referring Provider" from the search tool, they will receive an error message, "Referring Provider needs to be an organization if Individual Referring Provider is entered".

Tips For Using the Individual Referring Provider Search Tool

- PCC entity/SLs that are CHCs, HLHCs, OPDs, IHS and group practices can search for an
 Individual Referring Provider by using one or more of the following search criteria: business
 name, provider's last name, provider's first name, gender, city, zip code, provider ID or NPI,
 specialty, or provider type. For a quick and effective search we recommend using either the NPI
 or the Provider ID.
- As noted above, because the search tool contains all active MassHealth providers, please be
 advised that providers not meeting the required qualifications may be included in your search
 results. Choose an individual provider who meets the four required qualifications to avoid
 receiving an error message.

The following is a list of possible error messages:

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POSC Message	Explanation	Action
Individual Referring Provider is required when the Referring Provider is an Organization.	The Referring Provider is a PCC that is an Organization (CHC, HLHC, OPD, IHS or Group Practice) and the Individual Referring Provider field is not filled out.	Search for and select a qualifying Individual Referring Provider.
The Referring Provider and Individual Referring Provider are not affiliated.	The PCC Organization did not identify to MassHealth the selected Individual Referring Provider.	Contact MassHealth to identify the selected provider as qualified to be an Individual Referring Provider OR Search for and select a qualifying Individual Referring Provider that has been identified to MassHealth
Provider must be in a valid pay status on the date of submission.	The Individual Referring Provider is not an active MassHealth provider (qualification #4 above).	Search for and select an Individual Referring Provider that is an active MassHealth nonbilling or fully participating provider.
Referring Provider needs to be an organization if Individual Referring Provider is entered.	The Referring Provider is not an organization (CHC, HLHC, OPD, IHS or Group Practice).	Leave the Individual Referring Provider field blank because the Referring Provider is an individual physician or independent nurse

For specific instructions on how to submit, update, or inquire about a referral, please see the MassHealth POSC Job Aids at:

 $\underline{http://www.mass.gov/eohhs/gov/newsroom/masshealth/providers/mmis-posc/training/gettrained.html}$

practitioner.

MassHealth Enrollment of Qualifying Individual Referring Providers

The MassHealth Customer Service Center (CSC) is working with PCC organizations, including group practices, to collect information about their physicians and nurse practitioners who are not individually enrolled with MassHealth but who otherwise meet the first three qualifications above and to encourage those providers to enroll in MassHealth.

Physicians and nurse practitioners who wish to enroll in MassHealth as non-billing providers must fill out and return the Nonbilling Provider Application and Contract. These documents can be downloaded from the MassHealth website at www.mass.gov/eohhs/docs/masshealth/aca/pe-nbp-con.pdf.

Physicians and nurse practitioners who choose to enroll as fully-participating MassHealth providers may do so by contacting the CSC by email at providersupport@mahealth.net or by phone at 1-800-841-2900 to request an enrollment application. Please note that physicians and nurse practitioners in group practices must enroll as fully-participating MassHealth providers.

As described in <u>All Provider Bulletin 259</u>, state law also requires that authorized ORP providers apply to participate in MassHealth in order to obtain and maintain state licensure. This licensure requirement will become effective once MassHealth promulgates the implementing regulations. Please note that MassHealth will promulgate the ORP regulations in coordination with the promulgation of additional enrollment-related regulations that are still in process.

Provider Education Opportunities

Please see the website linked below for information on instructional webinars about the POSC referral process and about the general Ordering and Referring requirements.

http://www.mass.gov/eohhs/provider/insurance/masshealth/aca/aca-section-6401enrollment-information.html for more information.

Provider Information Maintenance

It is extremely important that provider information be kept up to date in the POSC. PCC entities/service locations should contact MassHealth about any staffing changes in order to ensure that their physicians and nurse practitioners who are not yet enrolled with MassHealth but who otherwise meet the first three qualifications above are enrolled into MassHealth, and so that POSC PCC referrals can be correctly processed. Individual physicians and nurse practitioners should also contact MassHealth whenever they join or leave the staff of a PCC entity/service location.

Send changes, including changes in individual physician and nurse practitioner staffing, to:

MassHealth Attn: Provider Enrollment and Credentialing P.O. Box 121205 Boston, MA 02112-1205

Fax: 617-988-8974

Include your MassHealth provider number and tax identification number on all correspondence.

Questions

If you have any questions about the information in this bulletin, please contact the CSC at 1-800-841-2900, e-mail your inquiry to providersupport@mahealth.net, or fax your inquiry to 617-988-8974.

For more information about the ordering, referring and prescribing requirements, please visit: $\underline{www.mass.gov/eohhs/provider/insurance/masshealth/aca/aca-section-6401enrollment-information.html.}$