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## **ONA and CM Billing:**

As stated, an ONA is comprised of multiple activities. However, it is considered as one task for the purposes of making a claim for the service of eXPRS.

Conducting any of the three required components and entering information into the tool are not separate case management activities, even when a case manager is doing them. Only the completion of an ONA is billable as a case management activity. However, conducting a component of an ONA does not preclude the possibility of a billable case management activity from occurring on the same day, regardless of who conducts the ONA (assessor or case manager).

If an assessor completes the ONA on a date (i.e. submits to eXPRS), and the case manager delivers a case management service on the same date, then the assessor can make a claim for completing the ONA, and the case manager can make a claim for delivering a different case management service. This is the only circumstance where two case management claims may be made for same individual on the same day.

A case manager who has been adequately trained to do so may conduct an ONA when an assessor is not required to conduct it. If the case manager conducts all the components of the ONA and determines that the individual's functional needs have not changed, and completes the ONA, the case manager can make a case management claim for that date. On that same day, the case manager who completed the ONA may not make a claim for an additional case management service.

If, on the other hand, while conducting an ONA, the case manager determines that the individual's functional needs *have* changed and that an assessor is required to complete the ONA, then that determination will be considered a case management service and may be claimed as such, but a claim for an ONA completion cannot be made by the case manager.

A progress note is required to support a claim for completing an ONA. The progress note must meet all the requirements of a progress note that supports any other case management service claim. The CME can establish internal



