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# Welcome

## 2021 CMS PERM Audit Corrective Action Plan (CAP)

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# Referring Provider Requirement

- Code of Federal Regulations (CFR) 42 CFR 455.410(b) and 455.440 require States to enroll referring physicians or other professionals and all claims for payment that were referred to contain a National Provider Identifier.
- During the Payment Error Rate Measurement (PERM) 2021 audit cycle, a school-based claim was selected for audit. The claim did not include the required referring provider and was cited as an error.
- The State is required to perform a corrective action to meet the federal requirements.



# The Corrective Action

- The OHA worked in cooperation with Oregon Department of Education (ODE) and the Oregon Boards of Physical Therapy, Examiners for Speech-Language Pathology and Audiology, Occupational Therapy Licensing, and Nursing, to produce the following solution:
  - Individually enroll registered nurses (RN) employed or contracted by school district or EI/ECSE programs and have their NPI's as the referring provider for claims submission.
  - If an RN is not available to serve as the referring provider, school districts and EI/ECSE programs must individually enroll other medically licensed staff for services provided in within their scope of practice, such as Occupational Therapists, Physical Therapists, Licensed Clinical Social Workers, Speech-Language Pathologists, etc. to serve as the referring provider for claims submission.

# Enrollment

- The OHA created a unique Registered Nurse (494) specialty for Public Education, added to the Provider Type (56).
  - The Taxonomy is 163W00000X
  - Enrollment path for Referring providers
    - OHP 3113 and OHP 3975
- Enrollment for other Oregon medically licensed staff:
  - Occupational Therapists, Physical Therapists, Licensed Clinical Social Workers, Speech-Language Pathologists, etc.
    - If already individually enrolled as a Medicaid provider, no action needed.
    - If not Medicaid enrolled, obtain an NPI and complete the enrollment process as a non-billing provider using forms OHP 3113 and OHP 3975.



# The Lift



- Before December 31, 2023, school districts and EI/ECSE programs will need to:
  - Ensure RNs and other board licensed staff obtain an NPI, and
  - Individually enroll as a Medicaid provider. RNs will enroll and indicate on the application as noted below. Other providers will enroll as licensed.

The screenshot shows a web browser displaying the "EDMS COVERSHEET" form from the Oregon Health Authority. The form is titled "EDMS COVERSHEET" and "Use to fax documents for entry into the Oregon Medicaid Electronic Document Management System (EDMS)". It includes fields for "From:", "Phone:", "Date:", and "No. of Pages:". Below these are checkboxes for "Document Type": "Provider Enrollment (PE) - 503-378-3074", "Claim Documentation - 503-378-3086", "Prior Authorization (PA)", "Hearing Documentation (no central fax #)", "Grievance Documentation (no central fax #)", and "Correspondence - 503-378-3086". There are also checkboxes for "For PA requests, also check one box below": "Routine Processing - 503-378-5814", "Urgent Processing (72 hours) - 503-378-3435", and "Immediate Processing (24 hours) - 503-378-3435". A "Justification" field is present with the text "Referring RN Specialty 494". At the bottom, there are instructions for "Provider Enrollment requests" and "Prior Authorization requests and claim documentation".

- There is no cost for obtaining an NPI and enrolling with Medicaid

# The Lift



## Lastly:

- Update your Local Education Agency's (LEA) internal Medicaid billing processes to include a referring provider on Medicaid claims with your vendor submitter
- Add this process to Medicaid billing policy and procedure to ensure proper maintenance, tracking, and training



# FAQ

- Will an RN that serves multiple school districts/programs need to enroll in each school district/program?
  - An RN or other medically-qualified provider enrolls only once and maintains that enrollment. Multiple school districts/programs can submit claims for the referring provider if that provider is actively enrolled and employed or contracted to provide services for the LEA(s)
- How can ESDs, school districts, and programs map and track this?
  - Providers can be checked for an active enrollment on the non-secure provider portal, NPI verification. This can also be added to internal processes for LEA Medicaid billing policy and procedure.
- Not all districts have a nurse. Will contracting add layers to tracking?
  - The current structure of employment and/or contracting would not necessarily change. However, information about enrollment, serving as a referring provider, and how the information will be tracked may need to be added to contracting language.

# FAQ

- Can EI/ECSE staff also serve School Age?
  - Yes
- How much time do SD's have to update software systems?
  - The goal is to be completed with the enrollment and billing changes by December 31, 2023. Provider Enrollment & Provider Services is available to assist, upon request. Referring provider applications will be prioritized.
- Obtaining an NPI via NPPES.
  - National Provider Identifier (NPI) click on the following links to apply for NPI and review NPI FAQ: ([Apply Now - National Plan and Provider Enumeration System \(NPPES Website\)](#)) and FYI link to [NPI Frequently Asked Questions \(FAQs\)](#)
- More to Come!

# Questions and Assistance

Provider Enrollment, 800-336-6016, option #6

<https://www.oregon.gov/oha/hsd/ohp/pages/provider-enroll.aspx>

Enrolment, maintenance and revalidation assistance

Provider Services, 800-336-6016, option #5

<https://www.oregon.gov/OHA/HSD/OHP/Pages/Billing.aspx>

Portal and FFS claims assistance

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