Provider Revalidation

Office of Medical Assistance Programs Bureau of Fee-for-Service Programs



Agenda

- Overview of the Affordable Care Act – Provider Screening and Enrollment
- Discuss the revalidation requirements
 - Understanding the deadline of March 24, 2016
- How is PA doing regarding revalidation of Medical Assistance providers?
- Frequently asked questions
- Your questions?





The LAW

 Section 6401(b) of the Patient Protection and Affordable Care Act (Pub. L. 111–148), as amended by the Health Care and Education Reconciliation Act of 2010 (Pub. L. 111–152) (collectively known as the Affordable Care Act or ACA) amended Section 1902 of the Social Security Act (Act), to add subparagraphs (a) (77) and (kk), requiring that states comply with revised provider and supplier screening, oversight and reporting requirements.



The Regulations

 The Department of Health and Human Services issued implementing regulations, which can be found at 42 Code of Federal Regulations (CFR) 455, Subpart E – Provider Screening and Enrollment.



Overview of the major provisions in the regulations

- § 455.410 Enrollment and Screening The Department must require all ordering, referring and prescribing providers to be screened and enrolled as Medicaid providers
- § 455.412 Verification of Provider Licenses The Department must verify all providers are licensed and ensure the provider's license has not expired
- <u>§ 455.414 Revalidation of Enrollment</u> The Department must revalidate every provider enrollment regardless of provider type at least every five years.



- Overview of the major provisions in the regulations
 - § 455.416 Termination or Denial of Enrollment The Department must conduct screening of individuals with ownership and control interests and must deny the enrollment of providers who:
 - do not meet certain criteria set under the ACA or
 - who do not provide access for a site visit or
 - if the state or Centers for Medicare and Medicaid Services (CMS) determines that the provider falsified information.



- Overview of the major provisions in the regulations
 - § 455.436 Federal Database Checks The Department must confirm the identity and determine the exclusion status of providers and any person with ownership or controlling interest or who is an agent or managing employee of the provider through monthly checks of Federal databases.



- Overview of the major provisions in the regulations
 - § 455.450 Screening Levels for Medicaid <u>Providers</u> – The Department must screen all initial provider applications, including applications for a new service location, and any applications received for reenrollment or revalidation of enrollment. The screening is based on a categorical risk level of "limited," "moderate" or "high".



Overview of the major provisions in the regulations

- § 455.460 Application Fee The Department must collect an application fee when applicable based on provider type.
- § 455.432 Site Visits The Department must conduct pre and post enrollment site visits of providers who are designated as "moderate" or "high" categorical risks to verify the information submitted to the Department is accurate and to determine compliance with Federal and State enrollment requirements.



- Overview of the major provisions in the regulations
 - § 455.4344 and 450 Criminal Background Checks – The Department must conduct criminal background checks of providers designated "high risk" and require providers to consent to criminal background checks including fingerprinting when required to so under State law or by the level of screening based on risk of fraud, waste or abuse as determined for their provider type.



- Overview of the major provisions in the regulations
 - <u>§ 455.420 Reactivation of Provider Enrollment</u> The Department must re-screen the provider and require payment of any associated fees under § 455.460 before a provider's enrollment may be reactivated.
 - <u>§ 455.470 Temporary Moratoria</u> The Department will impose temporary moratoria on enrollment of new providers or provider types identified as posing an increased risk to the State MA program.



- Overview of the major provisions in the regulations
 - § 455.440 National Provider Identifier The Department must require all claims for payment for items and services that were ordered or referred to contain the National Provider Identifier (NPI) of the physician or other professional who ordered or referred.



 CMS releases an information bulletin – December 23, 2011 stating – "The Federal regulation at 42 CFR 455.414 requires States, beginning March 25, 2011, to complete revalidation of enrollment for all providers, regardless of provider type, at least every five years. Based upon this requirement, States must complete the revalidation process of all provider types by March 24, 2016."





- If you enrolled on or before March 25, 2011, you must be revalidated by March 24, 2016.
- If you enrolled after March 25, 2011, your revalidation must occur on or before 5 years from the date on which you initially enrolled.

Examples:

- If you enrolled October 31, 2003, you must revalidate by March 24, 2016.
- If you enrolled November 1, 2013, you must revalidate by November 1, 2018.



- To revalidate, providers must submit a completed enrollment application.
- Enrollment applications can be found on the DHS website
 - Click on Providers
 - Click on more
 - Under Health Care/Medical Assistance
 - Enrollment Information

Follow the instructions to complete the application and return the application to the relevant program office.



ODP Revalidation Applications <u>must</u> be sent to:

Provider Enrollment Unit

Department of Human Services

Bureau of Supports for People with Intellectual Disabilities

Room 413 Health and Welfare Building

625 Forster Street

Harrisburg, PA 17120-0701





Enrollment Information

In order for providers to participate with the Department of Human Services, they must first enroll. To be eligible to enroll, practitioners in Pennsylvania must be licensed and currently registered by the appropriate state agency. Out-of -state practitioners must be licensed and currently registered by the appropriate agency in their state and they must provide documentation that they participate in that state's Medicaid program. Other providers must be approved, licensed, issued a permit or certified by the appropriate state agency, and if applicable certified under Medicare. To enroll, providers must complete a Base Provider Erollment form and any applicable addenda documents dependent on the provider type.

Related Topics

No related topics were found.



PROMISe™ Provider Type (Code and Description)	Enroliment Documents
01 - Inpatient Facility:	*Inpatient Application *Hospital Based/Outpatient Clinic Application *Emergency Room Application
* Acute Care Hospital	*Acute Care Hospital Requirements
*Inpatient Psychiatric	*Inpatient Psychiatric Requirements
* Inpatient Drug & Alcohol Rehabilitation	*Inpatient Drug & Alcohol Rehab Requirements
*Inpatient Medical Rehabilitation	*Inpatient Medical Rehabilitation Requirements
*JCAHO Certified RTF (Residential Treatment Facility)	*JCAHO Certified RTF Requirements
02 - Ambulatory Surgical Center	* Enrollment Application / Provider Agreement * Requirements / Additional Information / Forms
03 - Extended Care Facility	* <u>Enrollment Application</u> * <u>Requirements</u> * <u>Special Provider Agreement for Change of Ownerships</u>
04 - Rehabilitation Facility	*Enrollment Application / Provider Agreement * Requirements / Additional Information / Forms
05 - Home Health Agency	* Enrollment Application / Provider Agreement * Requirements / Additional Information / Forms
06 - Hospice	* Enrollment Application / Provider Agreement * Requirements / Additional Information / Forms
07 - Capitation	* Enrollment Application / Provider Agreement * Requirements / Additional Information / Forms



ODP Revalidation

About 60% of the revalidation applications ODP receives are rejected. Applications are usually rejected due to mistakes. The top reasons for rejection include:

- Outdated version of PROMISe application used
- Pages missing from application
- BHSL license not included with application
- Supporting documents not included, such as Articles of Incorporation, IRS letter confirming FEIN, professional licensure, etc.

1/6/2016





REMEMBER!

If you are no longer using a site for services, please close the location in PROMISe - and delete it from HCSIS if you are an ODP Provider.

If you don't close unused sites, they will show up as needing revalidation.

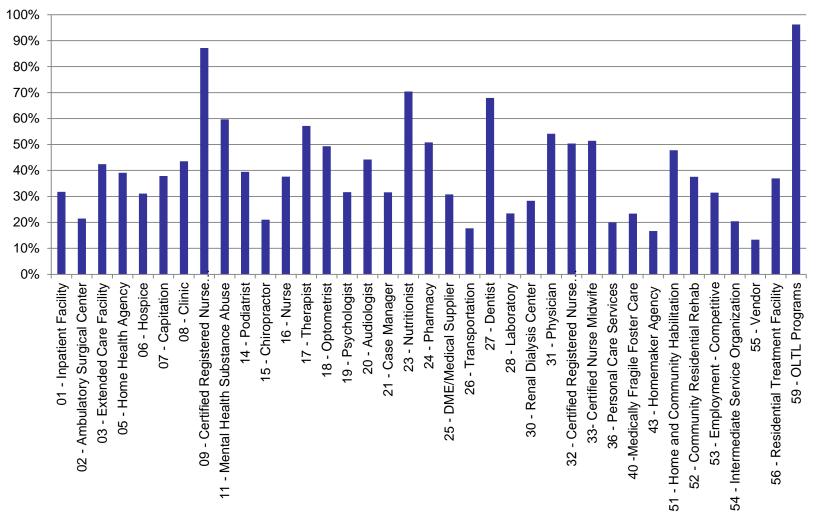


Revalidation Progress

- As of 12/26/2015 **67**% of service locations have revalidated.
- About 58,000 service locations need to revalidate by 3/24/2016.
- Over 115,000 service locations have been revalidated.
- Processing times for revalidation applications have been between 30-40 days.

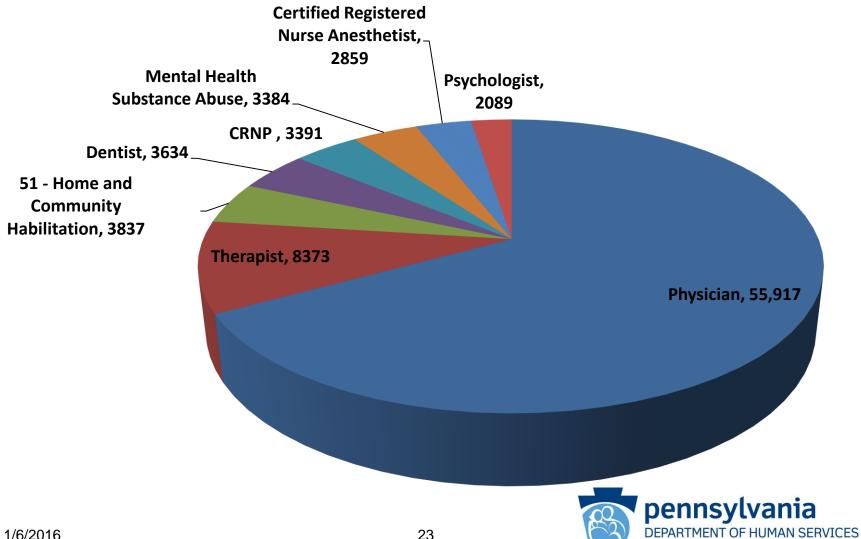


Percent of Revalidated Providers by Provider Type



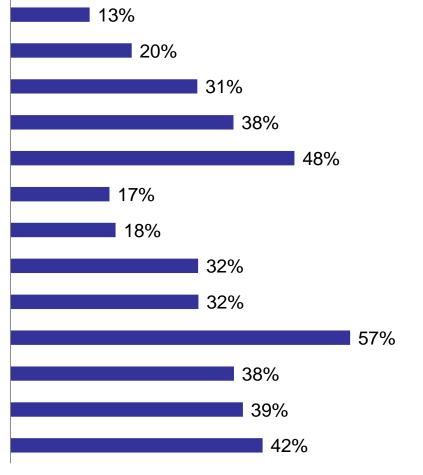


Largest MA Providers



Percent of ODP Revalidated Providers by Provider Type

55 - Vendor 54 - Intermediate Service Organization 53 - Employment - Competitive 52 - Community Residential Rehab 51 - Home and Community Habilitation 43 - Homemaker Agency 26 - Transportation 21 - Case Manager 19 - Psychologist 17 - Therapist 16 - Nurse 05 - Home Health Agency 03 - Extended Care Facility



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ARTMENT OF HUMAN SERVICES

ODP Revalidation information as of January 1, 2016

Total ODP Provider Locations = 14,147

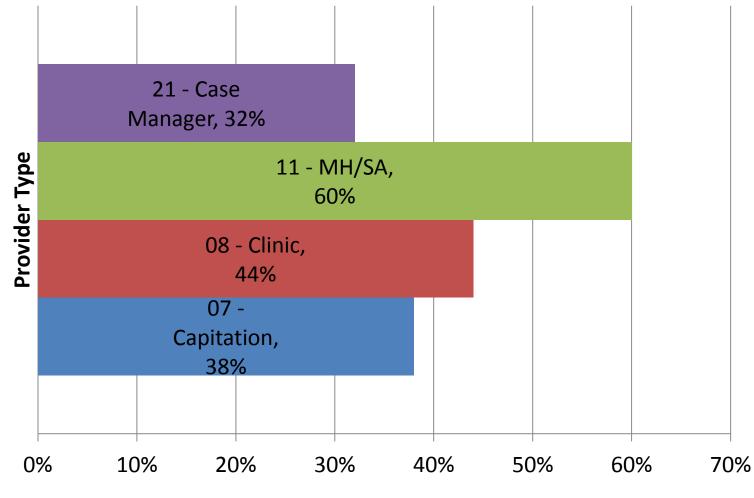
Locations in Need of Revalidation by March 24, 2016 = 7,000

Revalidation Applications Received and in Process = 2,500

Revalidation Applications Yet to Be Received = 4,500



Percent of OMHSAS Revalidated Providers by Provider Type





Who can I contact/where can I find more information on the Department's provider enrollment/revalidation process?

Additional information regarding the ACA requirements are on the Department's website at the following link: http://www.dhs.pa.gov/provider/providerenrollmentandscreeningrequirementsoft heaffordablecareact/

If providers have any questions about the enrollment process, please call the appropriate phone number on the <u>Important Phone Numbers and Addresses</u> page of the Department's website.



What are the new requirements for provider screenings due to the ACA? In compliance with the ACA, all providers are subject to ACA screening procedures for newly enrolling, reactivating, and revalidating providers. All providers must be screened upon submission of an application to: initially enroll in the PA MA program; add a new service location(s); and upon revalidation of the provider's enrollment.

During the required screening, the department will verify the provider's license (if applicable) and check the provider and any individuals with an ownership or controlling interest, agents or managing employees against the following Federal databases:

- Social Security Administration's Master Death File,
- The National Plan and Provider Enumeration System (NPPES),
- The List of Excluded Individuals/Entities (LEIE),
- The Excluded Parties List System (EPLS),
- And any other databases prescribed by the federal government.



Do I need to revalidate?

Yes. All enrolled providers must revalidate every five (5) years.

Will I be notified if I have to revalidate my enrollment?

All Medical Assistance providers have been encouraged to check their status in the Medical Assistance Enrolled Provider Portal Lookup Function at <u>promise.dpw.state.pa.us</u> or they can call Provider Enrollment at 1-800-537-8862 and follow the prompts for provider enrollment to determine their revalidation date. For providers who enrolled in the Medical Assistance program prior to March 24, 2011, their revalidation date is March 24, 2016.

The Department has sent out Medical Assistance Bulletins, notified providers via messaging on Promise, put messages on the Department's provider toll free numbers, put information on its website and asked provider associations to communicate this revalidation deadline.



Are there any providers that are not required to revalidate?

All Medical Assistance providers are required to revalidate every 5 years. Those who enrolled in the Medical Assistance program after March 24, 2011 will have a revalidation date 5 years from their enrollment date.

Example: If a provider enrolled in Medical Assistance effective October 4, 2013, their revalidation date would be October 4, 2018.

Providers are encouraged to check their status in the Medical Assistance Enrolled Provider Portal Lookup Function at <u>promise.dpw.state.pa.us</u> or they can call Provider Enrollment at 1-800-537-8862 and follow the prompts for provider enrollment to determine their revalidation date

What is the deadline for revalidation?

The ACA requires that all Medical Assistance providers revalidate by March 24, 2016 thus all providers who enrolled in Medical Assistance prior to March 24, 2011 must revalidate by March 24, 2016.



How often must I revalidate my application?

All enrolled Medical Assistance providers must revalidate their enrollment every five years.

If our agency currently has multiple service locations and/or provider types enrolled, do we still need to complete an application for each service location?

Yes, a separate application is required for every service location that is currently enrolled.

There is no mention of a fee with these revalidations. Does this mean that we don't have to pay an application fee?

The Department is not currently assessing an enrollment fee, however, the Department is working on coming into compliance with this federal mandate.



Are tax returns and business policies required for revalidation?

Yes, as per 55 Pa. Code § 52.11 Prerequisites for Participation, these documents are required for initial enrollment and revalidation for certain provider types/specialties.

If there have been no changes to report since my initial enrollment, do I have to revalidate?

Yes.

Where can we submit specific questions regarding our agencies revalidation?

Please direct all questions to the Department program office. Please see the following website for contact information -

http://www.dhs.pa.gov/learnaboutdhs/helpfultelephonenumbers/contactinformat ionhelpformaproviders/index.htm



Resources / Contact

Remember - you may have already revalidated! DHS encourages providers to check the MA Enrolled Provider Portal Lookup Function to determine your revalidation date. All provider letters and portal login screens contain your next revalidation due date.

Additional guidance for ODP providers can be found in <u>Informational Memo 041-14</u>, *Provider Action: Revalidation of Enrollment Required for All Service Locations.*

Questions about the revalidation process may be directed to the ODP Provider Enrollment Unit at <u>RA-odpproviderenroll@pa.gov</u>





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