



# Ordering, Referring and Rendering Provider NPI on Claims

2022 MSBS FALL TRAINING

# What is ORP?

- ▶ The Affordable Care Act (ACA) and CFR Title 42, Part 455 require that attending, ordering, referring, rendering and prescribing providers be enrolled in the Medicaid program in order to meet ACA program integrity requirements designed to ensure that all attended, prescribed, ordered referred or rendered services, items and admissions for Medicaid beneficiaries originate from properly licensed provider who have not been excluded from Medicare or Medicaid.
- ▶ The expectation is that most services and items will only be paid by the Medicaid program if the individual provider who attends, prescribes, orders, refers or renders a service is enrolled in the Medicaid program. Otherwise, the claim will be denied in accordance with federal regulations.

# What Does This Mean for MSBS?

- ▶ The majority of rendering providers in MSBS are already enrolled and their NPI is populated on all claims submitted by the schools for these providers.
  - ▶ ASL, COTA and PTA bill under their supervisor's Medicaid and NPI numbers which populate on their claims.
- ▶ Effective July 1, 2022, HSD is requiring the NPI of the referring provider on MSBS claims for SLP, OT, PT and Audiology.
  - ▶ The lack of the referring provider NPI on MSBS claims has been a PERM finding for the last several cycles.
  - ▶ CMS is now requiring that HSD find resolution and begin requiring the referring provider NPI for OT, PT SLP and Audiology claims. Failure to do so could result in the recoupment of payments for the non-compliant services billings.

# Who is the “Referring” Provider?

- ▶ CMS has provided guidance to HSD that “The state having the authority to determine scope of practice through state law, may broaden a provider’s scope of practice to allow, in this case, the professional that was an existing member of the IEP team (e.g. OT, PT, SLP or Audiologist) the authority to order the specified services and act as the ORP provider and be identified as such on claims for services furnished pursuant to the IEP.”
- ▶ In plain English...the OT, PT, SLP or Audiologist that participates in the IEP team (writes the therapy specific goals & objectives) and represents the district in determining such services are needed by the child can serve as the “referring” provider for those specific services for the term of that IEP.

# Discussions Related to Implementation

- ▶ HSD has been in contact with CMS, PED and the main 3<sup>rd</sup> Party Biller (SSG) to discuss this requirement and implementation timeline.
  - ▶ The majority of school providers are already enrolled and MSBS Coordinators should have their NPI information easily accessible.
  - ▶ The SSG system is capable of capturing this information and can accommodate the requirement.
    - ▶ Manual entry of the referring NPIs can be easily accomplished for smaller districts provided that the MSBS Coordinator has access to the IEPs and can see which providers were part of the IEP team (Signature Page of IEP).
    - ▶ All of the large districts in the state are doing data dumps from their Student Information/IEP Systems to populate MAXCapture.
  - ▶ HSD has provided CMS with a summary of the steps we feel are necessary and approximate timeline for full implementation.

# Medicaid Referring Provider Form

- ▶ HSD has worked with PED to create the **Medicaid Referring Provider Form for School-Based Services**.
  - ▶ Will be a stand-alone form for FY23.
  - ▶ Incorporated into Elementary and Secondary IEP templates in FY24.
    - ▶ Districts will need to complete independently of IEP until fully incorporated into IEP template.
  - ▶ Communicated to IEP vendors as a required form for each IEP.
    - ▶ Can be populated with information provided by MSBS Coordinator.
    - ▶ Drop-down boxes will allow for Provider Name, Credentials & NPI to be populated.

# Form Demographics Section

## Medicaid Referring Provider Form for School-Based Services

Student's Name:	Click or tap here to enter text.	DOB:	Click or tap here to enter text.
School District:	Click or tap here to enter text.		
Student State ID Number:	Click or tap here to enter text.		
IEP Dates of Service:	Click or tap here to enter text.		
Primary Care Provider Name:	Click or tap here to enter text.		

# ORP Section

## Ordering and Referring Provider

The following is (are) the referring service provider(s) that participated as part of the IEP team to develop the goals and objectives for Click or tap here to enter text. including the level and amount of services required to meet the annual goals (functional and academic) of the child. The referring provider may or may not have attended the IEP meeting, following the excusal attendance requirements. However, they did contribute to the development of the IEP and determination of need for special education and related services. The referring provider assisted in the determination of such services that are needed by the child.

Ordering and Referring Provider Name and Credentials (i.e., Audiologist, Occupational Therapist, Physical Therapist, Speech-Language Pathologist)	Ordering and Referring Provider NPI#	Service Ordered (Audiology, Occupational Therapy, Physical Therapy, Speech-Language Pathology)
Click or tap here to enter text.	Click here	Choose an item.
Click or tap here to enter text.	Click here	Choose an item.
Click or tap here to enter text.	Click here	Choose an item.
Click or tap here to enter text.	Click here	Choose an item.

*Note to IEP Teams: Related services other than the four listed on this form continue to be Medicaid reimbursable, but do not require the completion of this form.*



# Additional Acknowledgement of Annual Notification

## **Annual Notification to Parents of Medicaid Billing**

I have received a copy of my annual Written Notification of the school district's access of my child's Medicaid benefits to pay for Medicaid-Eligible IEP services and release and exchange of necessary information and medical records with my child's Primary Care Provider (PCP) and the Medicaid agency from my child's school to complete the billing process. I understand that I have previously given my Consent to Access Medicaid and Disclose Confidential Information and that my consent is voluntary and may be revoked at any time. However, I understand that if I revoke consent, my revocation is not retroactive (i.e., it does not negate an action that has occurred after the consent was given and before the consent was revoked). I understand that Medicaid reimbursement for school-based services does not impact my family's Medicaid services, funds, or limits, including those of any Medicaid Waiver program.

Parent Initials

# Implications of Districts Using Data Dumps to Populate Billing System

- ▶ HSD is going to continue collaboration with the PED, SPED Bureau on changes to the IEP template that would be state required in order for the IEP vendors to then implement for all school clients.
  - ▶ IEP template changes are typically done at the beginning of a school year, so we would be looking for an implementation date of July 1, 2023.
  - ▶ Form released in 2022 would be incorporated without additional changes.
- ▶ Districts may be able to get form implemented in a way that could populate data dump for FY23.
- ▶ HSD will continue to communicate with CMS on our proposed implementation and potential changes that they may request to meet their requirements.

# What Should Districts Be Doing Now?

- ▶ Smaller districts that will be doing manual entries into the billing system should start making arrangements to get access to IEPs.
- ▶ Ensure all providers that are doing evaluations/IEPs but may not be providing regular services are enrolled with Conduent.
  - ▶ It is ok if these providers are paid with IDEA or other funds. Their NPI will populate on the claims, but they do not have to be providing regular services.
- ▶ Start taking with providers about the expectation that if they are the provider representing their service type at the IEP, their NPI will be utilized, and they will be identified as the “referring” provider for that IEP cycle.

Questions???