


<b>ISSUE DATE</b>  January 7, 2022	<b>EFFECTIVE DATE</b>  January 7, 2022	<b>NUMBER</b>  01-22-05, 08-22-05, 09-22-04, 10-22-01, 31-22-05
<b>SUBJECT</b>  Billing Procedure Update for Certified Registered Nurse Practitioners and Physician Assistants		<b>BY</b>   Sally A. Kozak, Deputy Secretary Office of Medical Assistance Programs

**IMPORTANT REMINDER:** All providers must revalidate the Medical Assistance (MA) enrollment of each service location every 5 years. Providers should log into PROMISe to check the revalidation dates of each service location and submit revalidation applications at least 60 days prior to the revalidation dates. Enrollment (revalidation) applications may be found at: <https://www.dhs.pa.gov/providers/Providers/Pages/PROMISe-Enrollment.aspx>.

**PURPOSE:**

This Medical Assistance (MA) bulletin is to inform providers of changes to the billing procedures for Certified Registered Nurse Practitioners (CRNPs) and Physician Assistants (PAs).

**SCOPE:**

This MA bulletin applies to enrolled physicians, CRNPs and PAs who render services in the MA fee-for-service delivery system. Questions pertaining to billing for services rendered by CRNPs and PAs under the managed care delivery system should be directed to the appropriate managed care organization.

**BACKGROUND:**

The Department of Human Services (Department) enrolls CRNPs as MA providers and makes payment to CRNPs, unless the CRNP is employed by or has a contractual relationship with a MA provider, in which case the MA provider, usually a physician or physician group, bills the Department. 55 Pa. Code § 1144.52. Prior to the enactment of the Patient Protection and Affordable Care Act (ACA), the Department did not require CRNPs to enroll as a MA provider if they were employed by or had a contractual relationship with an MA Provider who billed for the CRNP's services. The Department also did not enroll PAs as MA providers, as physician

**COMMENTS AND QUESTIONS REGARDING THIS BULLETIN SHOULD BE DIRECTED TO:**

Fee-for-service provider service center: 1-800-537-8862

Visit the Office of Medical Assistance Programs website at:

<https://www.dhs.pa.gov/providers/Providers/Pages/Health%20Care%20for%20Providers/Contact-Information-for-Providers.aspx>.

assistants are under the oversight and personal direction, and responsibility of the physician for the services they perform.

The ACA established requirements for provider screening and enrollment, including the requirement that physicians and other practitioners who order, refer or prescribe items or services for MA beneficiaries to enroll as MA providers. As a result, CRNPs who are employed by or under contract with a physician or physician group and PAs are now required to be enrolled in the MA Program if they order, refer or prescribe services for MA beneficiaries. However, the contracting/employing physician bills and is paid for services the CRNP and PA provide. See 55 Pa. Code §§ 1141.53(f); 1141.54(f). The CRNP or PA is not currently reflected as the rendering provider on the claim.

### **DISCUSSION:**

The Department, based on input from stakeholders, is updating the billing procedures to allow CRNPs and PAs employed by or under contract with a physician or physician group to be identified as the rendering provider on a submitted claim.

With this change, CRNPs and PAs can be identified as the rendering provider on a claim if the CRNP and PA provider type is identified on the billed procedure code on the fee schedule; however, MA payment will not be made to the rendering CRNP or PA for services rendered when the CRNP or PA is employed by or under contract with a physician or physician group. MA payment will continue to be made at the MA Fee Schedule rate to the physician or physician group with whom the CRNP or PA is employed by or under contract with to provide services.

### **PROCEDURE:**

Effective with dates of service on and after January 7, 2022, claims submitted to the Department for services provided by an enrolled CRNP or PA may, but are not required to, reflect the CRNP or PA as the rendering provider. The physician or physician group that employs or contracts with the CRNP or PA must be identified as the billing provider. Information regarding claim submission can be found in MA Bulletin 99-12-14, titled "NPI Requirements on All Claim Submission Media," issued December 19, 2012, and effective January 1, 2013.

The MA Program does not make direct payment to CRNPs or PAs who are employed by or under contract with a MA enrolled physician or physician group. CRNPs and PAs who are under this arrangement and are identified as the rendering provider on a claim must have their payment fee-assigned to their employing or contracting physician or physician group. MA enrolled CRNPs and PAs may request to be fee-assigned to the employing or contracting physician or physician group by following the instructions below:

- Log in to ePEAP at: <https://promise.dpw.state.pa.us/portal/Default.aspx?alias=promise.dpw.state.pa.us/portal/provider>. From the ePEAP menu, click on enrollment information, and

then click on the Fee Assignment Information. ePEAP gives the provider the option to add a group or manage fee assignments. The 13-digit MA identification number or PROMISE ID where the fees will be assigned will be needed.

- Complete and submit the following Request for Assignment of Fees form:  
[https://www.dhs.pa.gov/providers/Providers/Documents/p\\_023558.pdf](https://www.dhs.pa.gov/providers/Providers/Documents/p_023558.pdf)

CRNPs and PAs fee assigned to a physician or physician group will be enrolled with the partial episode payment adjustment (PEP) “Enrolled Rendering Only” (ERO).