



## Core Provider Agreement (CPA) and National Provider Identifier (NPI) for Medicaid Services FAQ

Last updated: February 5, 2019

### 1. What is a Core Provider Agreement (CPA)? Why is a CPA required?

The Code of Federal Regulations (federal law) mandates that the Washington State Health Care Authority (HCA) require a CPA so the HCA can enroll eligible providers in its Apple Health Medicaid programs to pay those providers for covered services, supplies, and equipment rendered to eligible Apple Health clients. Please note that for purposes of this FAQ, Apple Health includes the Integrated Managed Care (IMC) and Behavioral Health Services Only (BHSO or WrapAround) programs.

In addition, Washington Administrative Code (WAC) allows the option for providers who do not bill Medicaid but write orders and prescriptions for services Medicaid pays for to have “an approved agreement with the agency [HCA] as a nonbilling provider.” Providers and Community Health Plan of Washington (CHPW) must comply with the federal mandate.

The requirements have been in place for several years. However, validation that providers who are enrolled with managed care plans meet the requirements has not previously occurred.

The HCA requires contracted managed care organizations (MCOs) such as CHPW to report encounter data for purposes of quality assurance, risk adjustment, rate development, and Service Based Enhancement (SBE) payments. Data reporting must include all medical healthcare and pharmacy services delivered to eligible Medicaid clients.

The HCA enforces the federal requirement by rejecting encounters submitted by MCOs that contain any NPI that is not “known” to the HCA.

To ensure that a provider’s NPI is “known” to the HCA, the provider must have **either** a valid CPA **or** a Nonbilling Individual Provider Agreement (“nonbilling agreement” or NBA). The HCA provided information about this in a letter it sent to providers in 2016. A copy of the letter is available on our website at [http://chpw.org/resources/Providers/CPA\\_Letter\\_HCA.pdf](http://chpw.org/resources/Providers/CPA_Letter_HCA.pdf). A completed CPA or nonbilling agreement registers your NPI with (makes your NPI known to) the state.

The HCA recognizes these types of providers:

- Participating enrolled providers who bill through Washington State’s Medicaid billing and payment system, ProviderOne; and
- Nonbilling providers who may or may not have a contract with an MCO and do not bill fee-for-service (FFS) through ProviderOne.

If you do not have a CPA or nonbilling agreement with the HCA your managed care encounters will continue to be rejected by the HCA for missing, invalid, or unrecognized NPI. If your encounters are rejected, CHPW takes the following steps to ensure that we comply with the federal requirement, regardless of your contract status with CHPW:

- Deny claims for rejected encounters; and
- Recoup paid claims.

Additionally:

- Providers who have not started the CPA enrollment process at the time of initial credentialing request will not be credentialed until enrollment is in process.
- Providers who are in the process of completing enrollment for the CPA will be credentialed while the CPA status is pending.
- CHPW asks for your CPA or nonbilling agreement as part of our recredentialing process.

If you wish to enroll with Medicaid as a provider, please go to <http://www.hca.wa.gov/billers-providers/apple-health-medicaid-providers/enroll-provider> for more information and to access the HCA Core Provider Agreement.

If you wish to be an HCA nonbilling provider (you do not bill FFS through ProviderOne), you still need to take action: Go to <https://www.hca.wa.gov/billers-providers/apple-health-medicaid-providers/enroll-non-billing-individual-provider> for more information and to access the Nonbilling Individual Provider Agreement.

You can find additional information that may assist you at:

- The Washington Apple Health Encounter Data Reporting Guide, <https://www.hca.wa.gov/billers-providers-partners/programs-and-services/resources>
- WAC sections
  - 182-502-0005 Core provider agreement (CPA), <http://app.leg.wa.gov/wac/default.aspx?cite=182-502-0005>
  - 182-502-0006 Enrollment for nonbilling individual providers, <http://apps.leg.wa.gov/wac/default.aspx?cite=182-502-0006>
  - 182-502-0120 Payment for health care services provided outside the state of Washington, <http://apps.leg.wa.gov/wac/default.aspx?cite=182-502-0120>

## **2. Do I need both a CPA and a nonbilling agreement?**

No, you **cannot** have both a CPA and a nonbilling agreement. If you already have a CPA and you complete a nonbilling agreement, the existing CPA will be terminated and replaced by the nonbilling agreement. Please refer to <http://www.hca.wa.gov/billers-providers/apple-health-medicaid-providers/enroll-non-billing-individual-provider> for more information.

## **3. Do I need a CPA or nonbilling agreement if I am not located (do not practice) in Washington State?**

Yes. If you serve Washington Apple Health (Medicaid) clients, you need either a CPA or a nonbilling agreement.

## **4. If I complete a nonbilling agreement, does that change the way I manage my practice or the patients that I see?**

No. Having a completed HCA nonbilling agreement does not change which patients you see, how you serve your patients, or the way you manage your practice or business.

If you are an HCA nonbilling provider (you do not bill FFS through ProviderOne) and you have a nonbilling agreement:

- You are not obligated to see Medicaid members; and
- The HCA will not ask you to see Medicaid clients; and
- The HCA will not give your name to Medicaid clients.

**5. Is there a penalty if I don't complete a CPA or nonbilling agreement?**

Possibly.

Providers who do not have a CPA or nonbilling agreement for Apple Health but who are already known to CMS or another Medicaid program or agency will not be penalized.

Providers who do not have a CPA or nonbilling agreement for Apple Health and are not already known to CMS or another Medicaid program or agency could be assessed a penalty by the HCA.

Effective June 1, 2016, the HCA charges certain provider types an application fee for the CPA. Please refer to <http://www.hca.wa.gov/billers-providers/apple-health-medicaid-providers/enroll-billing-provider> and <https://www.hca.wa.gov/billers-providers-partners/apple-health-medicaid-providers/enroll-provider> for more information.

**6. If I (or my organization) already registered an NPI, does the NPI registration date need to match the CPA or nonbilling agreement effective date?**

Your NPI registration date does not need to match your CPA or nonbilling agreement effective date. However, your NPI effective date must occur before dates of service for submitted encounters and claims.

**Example**

- A provider registers an NPI January 1, 2019.
- The provider completes a CPA that becomes effective March 1, 2019.
- In April 2019, the provider submits claims with dates of service from December 2018.
- The encounters would be rejected by the HCA for missing, invalid, or unrecognized NPI.

Please note that, as stated in the ProviderOne Billing and Resource Guide ([http://www.hca.wa.gov/assets/billers-and-providers/providerone\\_billing\\_and\\_resource\\_guide.pdf](http://www.hca.wa.gov/assets/billers-and-providers/providerone_billing_and_resource_guide.pdf)), HCA does not pay for services during the CPA application process.

**Example**

- A provider submits a CPA application to the HCA electronically on February 1, 2019. This can take up to 30 days to process (see question & answer 8 below).
- The provider bills for services provided to a Medicaid client on February 23, 2019.
- The provider's CPA application is approved on February 28, 2019.
- The HCA (and therefore CHPW) would not pay for any services provided prior to February 28.
- The provider bills for services provided to a Medicaid client on March 10, 2019.
- The HCA (and therefore CHPW) would pay for covered services provided after the provider's CPA effective date of February 28.

**7. Why isn't being registered with NPPES (the National Plan and Provider Enumeration System) good enough? Why do I need to register through the Washington State HCA in addition?**

NPPES is a national system created by the Centers for Medicare & Medicaid Service (CMS) in response to the Administrative Simplification provisions of the Health Insurance Portability and Accountability Act of 1996 (HIPAA). NPPES is not specific to Washington State. As noted in question & answer 1, a completed CPA or nonbilling agreement registers your NPI with the state, which is the requirement CMS expects the HCA to achieve.



**8. How can I find out my CPA or Nonbilling Individual Provider Agreement status with the HCA?**

You can check your CPA enrollment status with the HCA online through ProviderOne, <https://www.waproviderone.org/ecams/jsp/common/pgLogin.jsp>. CPA applications submitted online take up to 30 days to process. CPA applications submitted by hard copy take up to 90 days to process.

Nonbilling agreements must be submitted by hard copy. An electronic option for nonbilling agreements does not currently exist. You will need to fax or mail the agreement to HCA and call or email the HCA to check the status.

If you have questions about your CPA or nonbilling provider enrollment application, you can call the HCA at 1-800-562-3022, ext. 16137 or email [ProviderEnrollment@hca.wa.gov](mailto:ProviderEnrollment@hca.wa.gov).

**9. My credentialing office is in the process of completing an HCA revalidation checklist. Is the revalidation somehow connected with registering an NPI and beginning the CPA process?**

No, this is not related to your revalidation. The HCA's Core Provider Agreement specifically states: "The Provider must provide its NPI to HCA (if eligible for an NPI) and include its NPI on all claims submitted." Please refer to <https://www.hca.wa.gov/billers-providers-partners/providerone/fact-sheets> for NPI requirements ("Claim submission" or "Billing with commercial insurance or Medicare as primary" category) or <https://www.hca.wa.gov/billers-providers-partners/apple-health-medicaid-providers/revalidation> for revalidation information.

**10. How will my encounters and claims be impacted if I have an NPI and a CPA but I'm not contracted with CHPW (non-participating/non-par)?**

If you already have a valid NPI and a CPA (or a nonbilling agreement), you should not need to take any action regardless of your contract status with CHPW. Your encounters will be accepted by the HCA and CHPW will pay your claims according to our normal process.

**11. I work for a large organization with several locations and multiple NPIs. How do I find out if any of our NPIs are registered with the HCA or tied to a CPA or nonbilling agreement?**

You can check your CPA enrollment status with the HCA online through ProviderOne, <https://www.waproviderone.org/ecams/jsp/common/pgLogin.jsp>. CPA applications submitted online take up to 30 days to process. CPA applications submitted by hard copy take up to 90 days to process.

Nonbilling agreements must be submitted by hard copy and take up to 90 days to process. An electronic option for nonbilling agreements does not currently exist. You will need to call the number below or email the HCA.

If you have questions about your CPA or nonbilling provider enrollment application, you can call the HCA at 1-800-562-3022, ext. 16137 or email [ProviderEnrollment@hca.wa.gov](mailto:ProviderEnrollment@hca.wa.gov).

**12. If my organization has multiple NPIs, do we need to register all of our NPIs and have a CPA for each one?**

Yes, you need to register each of your NPIs and complete a CPA or nonbilling agreement for each NPI. You also need to use your registered NPIs for billing purposes (submitting claims).

**13. If only one NPI is registered, how are claims impacted when the NPI used on the claim is not associated with the location billing?**

Encounters will be rejected when submitted to the HCA and will not be included in premium rate setting and enhancement payments. In addition, CHPW will deny claims for rejected encounters and, when necessary, recoup paid claims.



**14. When a facility has a CPA or nonbilling agreement, how are the individual providers impacted?**

Both the billing provider and the rendering (professional) or attending (institutional) provider NPIs must have a CPA or nonbilling agreement.

**15. What if I have questions that aren't addressed in this FAQ?**

Please contact the HCA at 1-800-562-3022, ext. 16137 with questions about a CPA or nonbilling agreement.

Please contact [Provider.Changes@chpw.org](mailto:Provider.Changes@chpw.org) if you have questions for Community Health Plan of Washington.