

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

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It is required that eligible Managed Care Organization (MCO)-contracted providers enroll their National Provider Identifier (NPI) with the Washington State Health Care Authority (HCA); or the provider must have an approved application on file with the state, dated on or before the date they begin seeing CHPW members.

CHPW follows the Apple Health fee-for-service guidance as well as federal law, which both mandate that eligible providers who see Medicaid clients obtain a Core Provider Agreement (CPA) with the HCA.

Providers who have enrolled their NPI with the Washington State Health Care Authority (HCA) can be paid for covered services, supplies, and equipment rendered to eligible WAHIMC and Behavioral Health Services Only (BHSO) clients.

In addition, Washington Administrative Code (WAC) allows the following option for providers who do not bill FFS Medicaid: Enroll with the agency (HCA) as a nonbilling provider. A completed nonbilling agreement registers your NPI with (makes your NPI known to) the state.

Please be advised that in order for your encounters and claims to be accepted, your NPI must be actively enrolled with the HCA; or you must have an approved application on file with the state, dated on or before the date you begin seeing CHPW members; or you must have a nonbilling agreement with the HCA. If you do not bill with a registered NPI, CHPW is required to deny claims and, if necessary, recoup paid claims.

Please continue reading for more information.

1. What if I'm not in Washington state or I'm not contracted with an MCO?

The CPA/nonbilling agreement requirement applies only to MCO-contracted providers who bill fee-for-service through the state's ProviderOne system. Non-contracted and out-of-state providers are not required to enroll with the HCA.

2. 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 Washington 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 [the 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.

- The HCA requires contracted 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 is enforcing 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).

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 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 wish to enroll with Medicaid as a provider, please contact the HCA at providerenrollment@hca.wa.gov or 1-800-562-3022 extension 16137.

You can also go to <https://www.hca.wa.gov/billers-providers-partners/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), go to <https://www.hca.wa.gov/billers-providers-partners/become-apple-health-provider/enroll-nonbilling-provider> for more information and to access the Nonbilling Individual Provider Agreement.

3. When do providers need to comply with this requirement?

Right away.

As of **January 1, 2022 dates of service**, the HCA is rejecting encounters from providers who did not complete their recertification process. HCA’s ProviderOne system is now editing for the following:

- 1) Billing Provider is not in Active status; and
- 2) Attending or Servicing Provider is not Active for Date of Service.

If an Apple Health provider is not in active status in ProviderOne for the date of service on the encounter, these edits will cause MCO encounters to be rejected.

4. What will happen if I don’t enroll with the state?

CHPW follows the Apple Health fee-for-service guidance. This means that **your NPI must be actively enrolled with HCA, or you must have an application on file with the state** in order for your encounters and claims to be accepted. If you do not bill with a registered NPI, CHPW will deny claims for rejected encounters and, if necessary, we will 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.

- If you are a CHPW-contracted provider, we will ask for your CPA or nonbilling agreement as part of our recredentialing process.

5. Can I bill the Medicaid client/health plan member?

No. Providers cannot bill the health plan member unless the member was informed prior to receiving services that the provider is not an active Apple Health provider. The member must agree to receive and pay for the services, and this agreement must be documented in the member's record.

See CHPW's Balance Billing Training at <https://www.chpw.org/provider-center/provider-training-and-resources/provider-billing-and-claims/> and the "Member and Balance Billing Protection Act (BBPA)" section of our Provider Manual, <https://www.chpw.org/provider-center/provider-manual/> for more information.

6. 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 see <https://www.hca.wa.gov/billers-providers-partners/become-apple-health-provider/enroll-billing-provider> for more information.

7. 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.

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

CHPW is not aware that a penalty may be assessed by the HCA. However, there may be an application fee.

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.

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

No, 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 November 1, 2022.
- The provider completes a CPA that becomes effective January 1, 2023.

- In February 2023, the provider submits claims with dates of service from December 2022.
- 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 (<https://www.hca.wa.gov/billers-providers-partners/providerone/providerone-billing-and-resource-guide>), HCA does not pay for services during the CPA application process.

Example

- A provider submits a CPA application to the HCA electronically on December 1, 2022. See questions **11** and **12** below for processing timelines.
 - Note: The provider can ask the HCA to backdate the effective date of the CPA to ensure that the CPA is effective prior to the date of service for which the provider will submit a bill. See question **19** for more information about backdating.
- The provider bills for services provided to a Medicaid client on December 23, 2022.
- The provider's CPA application is approved on December 28, 2022.
- The HCA (and therefore CHPW) would not pay for any services provided prior to December 28, 2022.
- The provider bills for services provided to a Medicaid client on January 10, 2023.
- The HCA (and therefore CHPW) would pay for covered services provided after the provider's CPA effective date of December 28, 2022.

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

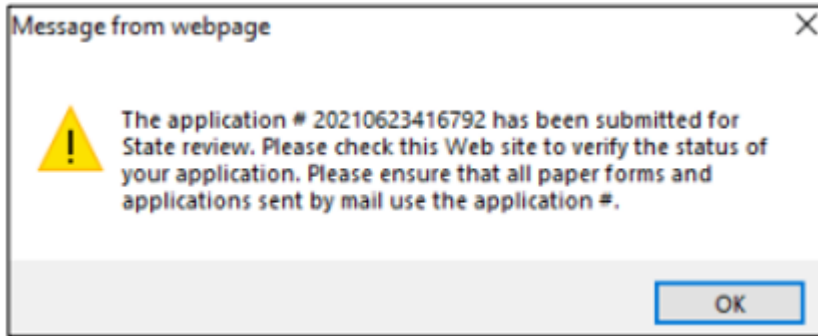
NPPES is a national system created by CMS in response to the Administrative Simplification provisions of the Health Insurance Portability and Accountability Act of 1996 (HIPAA). NPPES is not specific to Washington State. As noted throughout this FAQ, a completed CPA or nonbilling agreement registers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

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

12. 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>. A new CPA application may typically take up to four (4) months to process. A revalidation will typically take at least 45 days. Nonbilling agreements may be submitted by hard copy or online. You will need to fax or mail the hard copy agreement to HCA. The online enrollment application is available at <https://www.hca.wa.gov/billers-providers-partners/apple-health-medicaid-providers/enroll-nonbilling-provider>.

The HCA is experiencing a high volume of applications. Providers who have successfully applied receive the following message that includes a 14-digit application number:



If you have received this message, rest assured that your application is being processed and only contact HCA if you receive a notification about their application from the agency.

Please do not call HCA to confirm receipt of your application, unless you did not receive the above message when you submitted your application.

13. 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.

14. 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 process your claims as normal.

15. 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).

16. 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.

17. 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.

18. Where can I find more information about CPA and NBA?

You can find additional information that may assist you at:

- The HCA website, including:
 - The Washington Apple Health Encounter Data Reporting Guide, <https://www.hca.wa.gov/billers-providers-partners/programs-and-services/resources>
 - The HCA's billing provider enrollment page, <https://www.hca.wa.gov/billers-providers-partners/apple-health-medicaid-providers/enroll-billing-provider>
 - The nonbilling provider page, <https://www.hca.wa.gov/billers-providers-partners/apple-health-medicaid-providers/enroll-nonbilling-provider>
 - The Core Provider Agreement, <https://www.hca.wa.gov/assets/billers-and-providers/09-015-core-provider-agreement.pdf>
 - The Organizational Nonbilling Provider Agreement, <https://www.hca.wa.gov/assets/billers-and-providers/18-0008-organizational-nonbilling-provider-agreement.pdf>
 - The FAQ – Medicaid requirements for ordering, prescribing, and referring providers, https://www.hca.wa.gov/assets/fs_faqorderingprescribingreferringproviders.pdf
- 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>

19. What else do I need to know about registering/recertifying with the HCA?

The HCA is providing CHPW with a weekly NPI report to indicate their active and terminated providers. Claims are being rejected at the HCA due to the Attending, Servicing, or Billing provider not being active with the HCA for the date of service submitted on the claim.

CHPW is monitoring these rejections and validating the provider's NPI via the HCA NPI report. If your NPI is not active with the HCA at time of service, your claim will be adjusted and recouped with "provider is not active for date of service" denial reason CDASN (CARC 16, RARC N290) or CDPNA (CARC B7).

Immediate action is required if you have not already registered/recertified your NPI with the HCA before claims will be adjusted and repaid.

CHPW is contacting providers with the highest volume of claims to offer assistance and explain what is needed to ensure your NPI is registered/recertified with the HCA. Once you confirmed you have registered/recertified your NPI with the HCA and the HCA has processed your application, claims will be adjusted and repaid. CHPW's goal is to intervene before denying claims unnecessarily and to do our best to reduce rework.

During your recertification process, please make sure that the HCA backdates your NPI effective date. This will help ensure there is no lapse in the recertification of your NPI so that all dates of service for claims that you have submitted to CHPW will be after that effective date.

Claims denied for inactive NPI do not need to be resubmitted to CHPW. Please notify us when your registration/recertification is complete and we will validate your NPI is active with the HCA. Once your NPI is validated as active, we will adjust your claims accordingly.

Please contact CHPW via the contact information below to notify us you've registered/recertified your NPI with the HCA.

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

If you have questions about a CPA, please see <https://www.hca.wa.gov/billers-providers-partners/apple-health-medicaid-providers/enroll-billing-provider>.

If you have questions about a nonbilling agreement, please see <https://www.hca.wa.gov/billers-providers-partners/apple-health-medicaid-providers/enroll-nonbilling-provider>.

If you have questions for Community Health Plan of Washington, please contact our Provider Relations team at Provider.Relations@chpw.org.