



<b>ISSUE DATE</b>  November 2, 2016	<b>EFFECTIVE DATE</b>  November 2, 2016	<b>NUMBER</b>  01-16-32, 31-16-34
<b>SUBJECT</b>  Services Ordered, Referred, or Prescribed by Graduate Medical or Osteopathic Trainees		<b>BY</b>   Leesa M. Allen, Deputy Secretary Office of Medical Assistance Programs

**IMPORTANT REMINDER:** All providers must revalidate their MA enrollment every 5 years. Providers should log into PROMISe™ to check their revalidation date and submit a revalidation application at least 60 days prior. Enrollment (revalidation) applications may be found at [http://www.dhs.pa.gov/provider/promise/enrollmentinformation/S\\_001994](http://www.dhs.pa.gov/provider/promise/enrollmentinformation/S_001994).

**PURPOSE:**

The purpose of this bulletin is to inform providers of the process to submit claims for items or services ordered, prescribed or referred by graduate medical or osteopathic trainees for Medical Assistance (MA) beneficiaries.

**SCOPE:**

This bulletin applies to inpatient facilities, outpatient hospital clinics, emergency rooms, short procedure units and teaching physicians enrolled in the MA Program.

**BACKGROUND:**

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 ) amended Section 1902 of the Social Security Act, to add requirements for provider screening and enrollment, including a requirement that states require physicians and other practitioners who order, refer or prescribe items or services for MA beneficiaries to enroll as MA providers. The Department of Health and Human Services regulation implementing this requirement can be found at 42 CFR § 455.410.

On April 1, 2016, the Department of Human Service (Department) issued MA Bulletin 99-16-07, titled “Enrollment of Ordering, Referring and Prescribing Providers” informing providers that the Department will be

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

The appropriate toll free number for your provider type

Visit the Office of Medical Assistance Programs Web site at  
<http://www.dhs.pa.gov/provider/healthcaremedicalassistance/index.htm>

implementing the requirement for enrollment of ordering or prescribing providers. This bulletin also advised providers that when a claim is submitted, the Department will use the National Provider Identifier (NPI) of the ordering or prescribing provider included on the claim to validate the provider's enrollment in the MA Program.

### **DISCUSSION/PROCEDURE:**

The Department currently makes payment for items or services ordered or prescribed by individuals who have a graduate medical license or a temporary osteopathic license issued by the State Board of Medicine or the Board of Osteopathic Medicine; graduate medical or osteopathic trainees are often referred to as residents. The Department has not, however, enrolled these individuals as MA providers. As part of the Department's implementation of the requirement that providers who order or prescribe items or services for MA beneficiaries be enrolled in the MA Program, the Department will, as described below, provide the option for individuals with a graduate license or a temporary osteopathic license to either enroll in the MA Program as ordering and prescribing providers or include the NPI of the supervising physician on the claim as the ordering or prescribing provider.

**OPTION 1. Enrollment of Graduate Medical or Osteopathic Trainees** - Licensed graduate medical or osteopathic trainees can enroll in the MA Program as a Provider Type 31 (Physician) Specialty 301 (Osteopathic/Medical Trainee). Under this option, the graduate medical or osteopathic trainees are enrolling only to enable them to order or prescribe items and services for MA beneficiaries. MA enrollment does not enable them to receive payment for MA services. Graduate medical or osteopathic trainees enrolled as a Provider Type 31 must submit their renewed graduate medical license or temporary osteopathic license annually or reapply with their unrestricted licenses to continue participation in the MA Program. The licensed graduate medical or osteopathic trainee's NPI must be included on the claim as the ordering or prescribing provider. The Department will use that NPI to validate the graduate medical or osteopathic trainee's enrollment in the MA Program.

**OPTION 2. Supervising Physician's NPI** - The NPI of the physician who directly supervises the graduate medical or osteopathic trainee when services are ordered or prescribed by the licensed graduate medical or osteopathic trainee can be included on the claim as the ordering or prescribing provider. The Department will use the NPI number of the supervising physician included on the claim to validate the physician's enrollment in the MA Program.

### **RESOURCES:**

- The paper "Provider Enrollment Application for Graduate Medical or Osteopathic Trainees" is available on the Department's website at:  
<http://www.dhs.pa.gov/provider/promise/enrollmentinformation>