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Maryland Medicaid Provider NPI Specific per Location Requirement FAQs

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Policy and Regulations

Why is this new policy being implemented?

Maryland Medicaid is enacting this change to resolve the large volume of claim denials and rejections many of our providers experience due to multiple enrollment accounts and locations sharing one NPI. Enrollment with unique NPI's will reduce claims errors, eliminate ZIP code issues, and improve the management of enrollment information.

Where can I find more information on this policy?

Maryland Medicaid requires each location providing services to Maryland Medicaid recipients to have a unique NPI, regardless of the relationship between these locations. On January 2, 2024 Maryland Medicaid sent out a Provider Transmittal to inform providers of this change, see Section 7 of the <u>Winter</u> <u>General Provider Updates Transmittal</u> for more information.

This change comes from CMS guidelines. The Code of Federal Regulation allows a health plan to require health care providers to obtain a unique NPI as a condition of enrollment with the health plan, if the provider does not already have one. For information on the CMS issued guidance for site specific National Provider Identifier Enumeration, please refer to the Code of Federal Regulation 45 CFR § 162.412(b) or this <u>Guidance Document from CMS</u>.

Is a unique NPI necessary for all enrolled providers if they share a tax ID? Is a unique NPI necessary if the providers are the same provider just at different locations?

Regardless of the relationship between locations or accounts, each service location enrolled with Maryland Medicaid is required to have a unique NPI.

Can we consolidate our enrolled locations under one single Maryland Medicaid enrollment account?

No, Maryland Medicaid requires each location providing services to Maryland Medicaid recipients be enrolled separately. Multiple service locations cannot be consolidated under a single account.

Are there any exceptions to this policy?

Hospitals are excluded from the new NPI policy and can continue to share the same NPI across hospital enrollments. Additionally, this requirement does not apply to providers with a Type 1 Individual NPI.

The only exceptions to this requirement are Provider Type Skilled Nursing Facility Therapy Group (PT NT) and Provider Type Pharmacy (PT RX) also enrolled as Provider Type DMS/DME Provider (PT 62). For more information on the excluded provider types, see Section 2 of the <u>Summer General Provider</u> <u>Updates</u>.

Obtaining New NPIs and Logistics

Will MDH be providing the new NPI numbers?

No, your organization will need to obtain a new unique NPI from <u>NPPES</u> for all enrollment accounts currently sharing an NPI except for one account that may keep the original NPI. Please verify that the Primary Practice address listed on the NPPES registry for each unique NPI matches the address on file with Maryland Medicaid for each account.

I have questions about the spreadsheet that was sent to me.

The spreadsheet sent to you includes all enrollment accounts that share an NPI. Each account listed includes the current ePREP account number (KYP), NPI, MA or Provider Number, and the practice address associated with each account.

Once the unique NPIs are obtained from NPPES, please enter the new NPIs on the spreadsheet for the corresponding account in the column labeled "New NPI". The original account that will retain the current NPI has N/A listed in the "New NPI" column, indicating a new NPI is not needed for that account.

Before returning the spreadsheet, please verify that the Primary Practice address listed on the NPPES registry for each unique NPI matches the address listed on the spreadsheet for each account.

The email address listed in the "PROV_REMARKS" column is the contact we have on file for that account. To update the contact information, you will need to submit a supplemental application through ePREP for each account you wish to update. For ePREP account or application assistance please call the Maryland ePREP Hotline, 1-844-463-7768.

One or more of the locations listed on the spreadsheet has closed and/or is no longer providing services to Maryland Medicaid recipients. Can you remove the account from your system if I indicate which locations are closed when I send back the spreadsheet?

Unfortunately, we cannot remove or terminate any accounts without a disenrollment application on file. Please submit a disenrollment application in ePREP for any inactive locations/enrollment accounts so we can terminate the accounts in our system. For assistance submitting a disenrollment application, please call the Maryland ePREP Hotline, 1-844-463-7768.

Can I send back the spreadsheet with additional information or in a different format?

Please keep all original information and formatting intact when returning the completed spreadsheet, only entering the new NPIs in the designated column. For our systems to be updated correctly all information must remain organized in the specified spreadsheet columns.

How will the enrollment accounts be updated with the new NPIs? Will any other account information change?

The only change to your enrollment accounts will be a new site-specific NPI. All other account information (MA Provider Number, enrollment dates, affiliations, etc.) will be retained.

You do not need to submit any applications in ePREP to update your accounts. Instead, once the spreadsheet is received with the new NPIs, MDH will update our billing and enrollment systems for you. After each update you will receive an email that it has been completed from our official correspondence address, mdh.npiuncollapsing@maryland.gov.

Billing and Claims

How will this impact billing?

The provider will continue to bill as normal under the current NPI until MDH confirms that the enrollment accounts are updated with the new NPIs in all of our systems. Once the process is completed, the provider should start billing under the newly obtained NPI numbers.

If your organization participates with the MCOs the updated NPIs will be shared with those organizations. However, this process only informs the MCOs that the NPI is enrolled and eligible to participate with the MCOs. MCOs will need to be contacted by your organization to register the new NPIs.

If your organization bills for Medicare crossover claims, the <u>PECOS</u> account will need to be updated with the new NPIs.

Where should the new NPIs go on the claim?

The new NPI will replace the current NPI you use for billing. Please note that MDH will need to update the enrollment account internally before you can use the new NPI. You will continue billing using the existing NPI until MDH notifies you your account has been updated.

How will this impact the submission of claims? Do our claims need to include this Medicaid ID and associated location NPI?

Maryland Medicaid is not making any changes to our claims system as part of the new unique NPI policy. There should be no changes in how you are currently billing other than using the new NPI.

If you are currently including the shared NPI on claims along with the Medicaid ID, then you would use the new NPI in place of the current NPI on claims once our system is updated. If you are not including your NPI on claims now, you do not need to include the new NPI associated with a location after it is updated in our billing system.

Can I test claims that come from Maryland Medicaid to ensure all claims are paid with the new NPIs?

Yes, you can send in a few test claims using the new NPIs.

If the Medicare application is still in process, will this impact our payment of Maryland Medicaid claims?

If you submit crossover claims and the NPI on file with Medicaid and the NPI on file with Medicare do not match at the time of processing, the claims will deny and you would need to resubmit once the NPI matches.

What are the billing requirements for crossover claims to be accepted from CMS?

The new NPIs that you obtain will replace your current NPI. The new NPIs that you obtain will replace the current billing NPI.

For claims to crossover cleanly, the provider will need to ensure that the PECOS Enrollment NPIs match the Medicaid Enrollment account NPIs.

For more information on CMS 1500 billing instructions, see here.

How will this policy influence commercial payers?

The provider is not required to update the NPIs with all payers, only for the payers where Medicaid is the secondary payer. Crossover claims must be updated with the new NPIs.

If the provider has a primary commercial payer and a secondary medical assistance payer, do the NPIs for both need to match?

Yes, the NPI for the primary commercial payer needs to match the secondary NPI enrolled with Maryland Medicaid.

Do the NPIs in the rosters sent out to affiliates need to match the updated NPIs?

Yes, the NPIs in the roster will need to be updated with the correct NPIs on file with Maryland Medicaid.

Will the different location numbers associated with each MA based number remain the same?

Yes, the MA numbers will stay the same so each account should still be listed under the current base location number.

Contact Information

Provider Enrollment NPI Uncollapsing Contact Information

mdh.npiuncollapsing@maryland.gov

ePREP Call Center

For ePREP account or application assistance please call the Maryland ePREP Hotline, 1-844-463-7768.

CMS Contact Information

For questions or concerns regarding the CMS guidance, please send inquiries to AdministrativeSimplification@cms.hhs.gov with the subject line: NPI Guidance Question.

NPPES Contact Information

For specific NPPES questions or instructions please call 1-800-465-3203 to speak to an NPPES NPI Specialist.

MCO Contact Information

HealthChoice Provider Helpline: 800-766-8692, M-F 8am – 5pm Email: mdh.healthchoiceprovider@maryland.gov

Claims Contact Information

eMedicaid: mdh.emedicaidmd@maryland.gov Institutional (UB-04) Claims: 410-767-5457 EDI, electronic billing: mdh.ediops@maryland.gov

For additional contact information, please visit the Provider Services Contacts webpage.