


GOVERNMENT OF THE DISTRICT OF COLUMBIA  
Department of Health Care Finance



Officer of the Deputy Director

DHCF Transmittal No. 12-08

**TO:** Home Health Agencies Enrolled in the District of Columbia Medicaid Program

**FROM:** Linda Elam, PhD, MPH   
Deputy Director, Medicaid

**DATE:** APR 18 2012

**SUBJECT:** New Requirements for Multiple NPI Numbers on Claims for Medicaid State Plan Personal Care Aide Services

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As you know, new regulations governing the delivery of Medicaid Personal Care Aide (PCA) services under the authority of the District of Columbia (DC) Medicaid State Plan were published in the DC Register on March 2, 2012. These regulations will go into effect on July 2, 2012.

These regulations contain a number of new requirements that Medicaid providers delivering state plan PCA services must meet. If you have not already obtained a copy of these regulations, you can download them from the DC Municipal Regulations and DC Register website at <http://www.dcregs.dc.gov/Gateway/ChapterHome.aspx?ChapterNumber=29-50> . As I urged in my March 16, 2012 transmittal regarding the use of staffing agencies, please review these regulations carefully and take the necessary steps to comply with them in the coming months.

This is the second transmittal the Department of Health Care Finance is sending to you to review what you need to do to comply with certain provisions of the regulations. In addition, the Division of Long Term Care will review these regulations at its long term care provider meetings. This transmittal addresses new requirements for the use of National Provider Identification (NPI) numbers on all claims for reimbursement submitted on or after July 2, 2012 for the provision of state plan PCA services.

As you know, as required by the Health Insurance Portability and Accountability Act of 1996, all Home Health Agencies enrolled in the District of Columbia Medicaid Program must have a NPI from the National Plan and Provider Enumeration System (NPPES), and must submit this number on the UB-04 claim form when billing as a provider of PCA services. In addition to this current requirement, the March 2, 2012 regulations create three new requirements for submission of NPI numbers on all claims for reimbursement for State Plan PCA services. These requirements are:



1. All home health agencies enrolled as DC Medicaid providers of PCA services must ensure that all personal care aides that the home health agency employs to deliver Medicaid PCA services have NPIs. The NPI of the personal care aide delivering PCA services must be included on all claims for reimbursement for PCA services.
2. All home health agencies enrolled as DC Medicaid providers of PCA services and that use staffing agencies to deliver any PCA services must require that all such staffing agencies have an NPI number, and also must ensure that all staff provided to the home health agency by the staffing agency also have NPI numbers. These requirements are to be included in all contracts between the home health agency and any staffing agencies that the home health agency uses to deliver Medicaid state plan PCA services. Whenever a staffing agency is used to deliver Medicaid state plan PCA services, the NPI of the staffing agency must be included on all such claims for reimbursement.
3. All claims for reimbursement for PCA services must include the NPI number of the physician or Advanced Practice Registered Nurse (APRN) who ordered the PCA service.

Key provisions of the March 2, 2012 regulations containing these requirements are included as an attachment to this transmittal.

As you know, NPI numbers are obtained from NPPES at:  
<https://nppes.cms.hhs.gov/NPPES/Welcome.do>

The names and NPIs for the physician or APRN prescribing the service, the staffing agency (if one is used), and the Personal Care Aide delivering the service should be placed in the following lines on the UB-04:

The NPI and names for:	should be placed in the following lines on the UB-04:
Physician or APRN prescribing the service:	Line 76, labeled "Attending."
Staffing agency (if one is used):	Line 78, labeled "Other."
Personal Care Aide delivering the service:	Line 79, labeled "Other."

Beginning in July of 2012, DHCF will monitor claims submitted for reimbursement for State plan PCA services to ensure NPI numbers are listed for each provider, referring physician or APRN, staffing agency (if used), and personal care aide.

**All claims submitted without a NPI number for the physician or APRN prescribing the service, and Personal Care Aide delivering the service will be denied. We will also retroactively monitor for the appropriate use of NPIs when staffing agencies are used. Claims that do not include an NPI for a staffing agency when a staffing agency is used will be subject to a recoupment of the Medicaid payment amount.**

To avoid such errors, over the coming months, Medicaid HHA providers of PCA services must ensure all contract staffing agencies and personal care aides who provide personal care aide services apply for and receive NPI numbers. HHA providers of PCA services will also need to develop policies and procedures to implement and enforce these requirements.



services apply for and receive NPI numbers. HHA providers of PCA services will also need to develop policies and procedures to implement and enforce these requirements.

Also over the coming months, DHCF will continue to inform you about the new requirements contained in the new regulations. We greatly value the services that you deliver, and believe these new requirements will strengthen the quality and integrity of services offered to some of the Medicaid program's most vulnerable beneficiaries. We look forward to working with you to implement these new provisions of our Medicaid program. If you have any questions about this transmittal or Medicaid long term care improvements in general, please contact Ms. Yvonne Iscandari, Program Manager for the Division of Long Term Care, at 202-478-5818.

Thank you, again, for all you do.



**Key Provisions of Chapter 50, MEDICAID REIMBURSEMENT FOR PERSONAL CARE SERVICES, of Title 29, PUBLIC WELFARE, addressing use of NPI Numbers**

**General Provisions:**

5000.5 Each Provider application shall contain, but not be limited to, the following:

5000.5 (c): “Names of all individuals providing personal care services, license numbers and National Provider Identification (NPI) numbers from the National Plan and Provider Numeration System (NPPES) as of the date of application to become a District of Columbia Medicaid Provider.” . . . . .

5000.5 (g): “The applicant’s NPI number as required by the Health Insurance Portability and Accountability Act of 1996 (P.L. 104-191). This subsection highlights that the securing of the NPI as required, not optional.”

**Staffing Agencies:**

5001.1 A Provider may contract with a licensed staffing agency that will perform personal care services not to exceed a maximum of ten percent (10%) of the units of service provided in any given four (4) month period. Agreements between the Provider and the agency providing personal care staffing services shall be in writing and include at a minimum, the following:

50001.1 (a): “The staffing agency’s NPI number obtained from the National Plan and Provider numeration System (NPPES), and the NPI numbers of all staff supplied to the home health agency listed on all beneficiary documentation”.

50001.2: “Each Home Health Provider contracting with a staffing agency for personal care services shall:

- (a) Ensure that the staffing agency obtains NPI numbers for the agency and all personnel performing personal care services.
- (b) Provide DHCF with a copy of any and all contract(s) entered into with a staffing agency for the delivery of all personal care services on behalf of the Provider. Each of these contracts shall contain the personal care staffing agency NPI number and a list of NPT numbers for all individuals providing personal care services under the auspices of the personal care staffing agency on the date of the contract.

**Program Services:**

50005.2: Each prescription for PCA services under this section shall include the prescriber’s NPI number obtained from NPPES.

**Reimbursement:**

5010.5: All reimbursable claims for PCA services shall include the NPI numbers for the:

- (a) Provider;
- (b) Primary care physician or advanced practice registered nurse who ordered the personal care services;
- (c) Staffing agency providing the personal care service, if the staff performing personal care services were obtained from a staffing agency, and
- (d) Personal care aide who provided the personal care services.

