

Rhode Island Executive Office of Health and Human Services3 West RoadVirks BuildingCranston, RI 02920

MEMORANDUM

- To: Neighborhood Health Plan of Rhode Island (NHPRI) UnitedHealthcare of New England (UHC) United Healthcare Insurance Company (UHIC) Tufts Health Public Plans (THPP)
- From: Mark Kraics, Deputy Medicaid Program Director, Managed Care Oversight & Behavioral Health, EOHHS
- CC: Kristin Sousa, Medicaid Program Director, EOHHS Ana Novais, Acting Secretary, EOHHS Nicole Nelson, Director of Technology, EOHHS Amy Katzen, Director of Policy and Strategy, EOHHS Lynn Doherty, Medicaid Managed Care Compliance Officer, EOHHS
- **Date:** February 27, 2023

Subject: 21st Century Cures Act-Provider Screening and Enrollment Compliance Deadline for Medicaid Managed Care Organizations (MCOs)

As a part of the Affordable Care Act and later refined in the 21st Century Cures Act, federal laws enforced by CMS require that states screen and enroll all providers. Specifically, in compliance with the mandates contained in the <u>21st Century Cures Act 114 P.L. 255</u> (Act) Medicaid Managed Care Organization (MCOs) network healthcare providers under all service delivery models, including OPR's (Ordering, Prescribing of Referring providers), that furnish services to Medicaid beneficiaries, regardless of specialty (Providers), **must enroll with and be screened by the State Medicaid Agency (SMA).** Please be advised that under the Act such Provider enrollment and screening is mandatory even if the Provider is already enrolled as a Rhode Island Fee-for-Service (FFS) provider. The Provider enrollment and screening process will be managed for all enrolling Providers through EOHHS' fiscal intermediary, Gainwell Technologies' webbased portal.

Completing this enrollment process through the fiscal intermediary does not require a Provider to participate in the fee-for-service delivery system. Providers may continue with their current business model and are not mandated to provide care through the fee-for-service model unless that is their preference. Managed care Providers must still be enrolled, credentialed and contracted with the MCOs.

Pursuant to CMS requirements, all Providers must be screened by the State according to the following intervals and/or occurrence:

• Upon a Provider's submission of an initial application to become a Rhode Island Medicaid Provider;



- Upon a Provider's reenrollment (reactivation of a previously closed provider number) in Rhode Island's Medicaid program; and
- At least once every five (5) years to revalidate the Provider's enrollment in the Rhode Island Medicaid program, which is similar to the MCO recredentialing process.

Additional information can be found within CMS' <u>Medicaid Provider Enrollment Compendium</u> (<u>MPEC</u>).

EOHHS has regularly met with MCOs to plan for readiness and mitigate Provider abrasion to be compliant and enroll with the SMA. Provider communications were sent by MCOs in four (4) separate waves starting in January 2022 to allow for Provider awareness of the new requirements and help prepare for the influx of screening and enrollment applications by the compliance deadline contained in the Act.

EOHHS is requiring that all MCO network Providers not yet screened and enrolled as a Rhode Island Medicaid Provider through Gainwell Technologies come into compliance for dates of service no later than June 30, 2023. If a Provider has not been screened and enrolled as a Rhode Island Medicaid Provider, all claims/encounters with dates of service on or after July 1, 2023 shall not be accepted by Rhode Island Medicaid and will not be considered or count towards future rate setting.

Any Providers who have not completed Provider enrollment by July 1, 2023 will have their patients assigned to another physician and will be terminated from the Rhode Island Medicaid program. Please note that Providers must still be screened and enrolled as a Rhode Island Medicaid Providers before June 1, 2023, even if the Provider is already enrolled as a Rhode Island FFS provider.

The Provider Enrollment Portal remains open for Providers required to enroll who have not yet applied. Providers with multiple Provider types must complete enrollment for each Provider type.

Providers who submit Provider enrollment applications should allow several weeks for application processing.

It is imperative that the MCOs encourage Providers to act now by immediately starting the Provider enrollment process to avoid disruption in payments, member access to critical services or face provider termination. Providers should expect impacts to claims processing, and risk not getting paid if enrollment is not complete. EOHHS encourages the MCO's to be diligent with outreach and assist the Providers to enroll as soon as possible so as to avoid termination.

Lastly, pursuant to current Agreements, Section **2.08.13 'Mainstreaming'** for medical MCOs and **2.8 PROVIDER NETWORKS G. Mainstreaming** for Rite Smiles, MCOs must ensure to comply with Medicaid Managed Care Service Delivery Arrangements (210-RICR-40-10-1), Section 1.12 Mainstreaming/Selective Contracting that prohibits MCOs to selectively contract for Medicaid and commercial insurance and offer different provider networks.



If a Provider needs technical assistance, please contact the Customer Service Help Desk at (401) 784-8100 for in-state and long-distance calls or 800-964-6211 for in-state toll calls.

We thank you for your cooperation and support to comply with this requirement.

Yours in Health,

Mark D Kraics, Deputy Medicaid Program Director, Managed Care Oversight & Behavioral Health, Rhode Island Executive Office of Health and Human Services

