NOTICE OF PROPOSED POLICY

Public Act 280 of 1939, as amended, and consultation guidelines for Medicaid policy provide an opportunity to review proposed changes in Medicaid policies and procedures.

Please review the policy summary and the attached materials that describe the specific changes being proposed. Let us know why you support the change or oppose the change.

Submit your comments to the analyst by the due date specified. Your comments must be received by the due date to be considered for the final policy bulletin.

Thank you for participating in the consultation process.

Jackie Protop
Director, Program Policy Division
Bureau of Medicaid Policy, Operations, and Actuarial Services

Project Number: 1907-Enrollment
Comments Due: June 26, 2019
Proposed Effective Date: October 1, 2019

Mail Comments to: Vicki Goethals
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Policy Subject: Enrollment Requirement for Prescribers

Affected Programs: Medicaid, Healthy Michigan Plan, Children’s Special Health Care Services (CSHCS), Maternity Outpatient Medical Services (MOMS)

Distribution: All Providers

Policy Summary: The purpose of this policy is to enforce the federal requirement that prescribers are enrolled with the state Medicaid agency.

Purpose: To protect Medicaid beneficiaries by strengthening program integrity and care quality.
Proposed Policy Draft

Michigan Department of Health and Human Services
Medical Services Administration

Distribution: All Providers

Issued: August 1, 2019 (Proposed)

Subject: Enrollment Requirement for Prescribers

Effective: October 1, 2019 (Proposed)

Programs Affected: Medicaid, Healthy Michigan Plan, Children’s Special Health Care Services (CSHCS), Maternity Outpatient Medical Services (MOMS)

The purpose of this bulletin is to enforce federal Medicaid enrollment requirements that apply to providers who prescribe drugs to Medicaid beneficiaries. These requirements are outlined in Section 6401 of the Patient Protection and Affordable Care Act and Section 5005(b)(2) of the 21st Century Cures Act. The purpose of these requirements is to protect Medicaid beneficiaries by strengthening program integrity and care quality.

Effective October 1, 2019, providers who prescribe drugs to Medicaid beneficiaries must be actively enrolled in the Community Health Automated Medicaid Processing System (CHAMPS) – the state’s online Medicaid enrollment system. The Michigan Department of Health and Human Services (MDHHS) will prohibit payment for prescription drug claims written by a prescriber who is not enrolled in CHAMPS.

For Prescribers

Claims for drugs prescribed by a provider who is not enrolled in CHAMPS will be denied. This applies to all providers who prescribe drugs, including medical residents. In order to avoid interruptions in beneficiaries’ drug therapy, prescribers are encouraged to enroll in CHAMPS as soon as possible. For information about the provider enrollment process and how to get started, visit www.michigan.gov/MedicaidProviders >> Provider Enrollment. Providers who have questions about the enrollment process or require assistance may contact MDHHS Provider Support at 800-292-2550.

For Pharmacies

Since July 1, 2018, Medicaid Fee-for-Service and Medicaid Health Plans have posted the following informational edit on pharmacy claims for drugs written by a prescriber who is not enrolled in CHAMPS:

NCPDP Code 889: PRESCRIBER NOT ENROLLED IN STATE MEDICAID PROGRAM
Starting October 1, 2019, subsequent claims with this edit will be denied.

There may be certain emergency circumstances where a beneficiary must receive his prescription medication. In those instances, the pharmacy may override the edit using either of the following Submission Clarification Codes in NCPDP field 420-DK, when applicable:

- 13 – Payer-Recognized Emergency/Disaster Assistance Request
- 55 – Prescriber Enrollment in State Medicaid Program has been validated

When the above codes are not applicable, a pharmacy or prescriber may initiate an override request by contacting the healthcare payer’s Pharmacy Help Desk. For overrides on Medicaid Fee-for-Service claims, call 888-411-6343. For Medicaid Health Plan contact information, visit www.michigan.gov/MCOpharmacy.