

## PROVIDER MEMO

**Date:** November 21, 2023

**Subject:** Billing Guidelines for Non-Physician Medical Practitioners

Dear Provider:

This memo is to serve as a reminder to all providers on the billing guidelines for the Non-Physician Medical Practitioners (e.g., mid-level providers) for both Medi-Cal and non-Medi-Cal providers. Services rendered by Non-Physician Medical Practitioners (NMPs) are covered by Medi-Cal. This includes:

- **Physician Assistants (PA):** Mid-level medical practitioner who works under licensed doctor (an MD) or osteopathic physician (a DO) supervision.
- **Nurse Practitioners (NPs):** Practitioner who is a licensed Registered Nurse (RN) legally entitled to use the title of NP.
- **Certified Nurse Practitioners (CNPs):** Practitioner who is certified and can render services as independent provider.
- **Certified Nurse Midwives (CNMs):** Advanced practice registered nurse who has specialized education and training in midwifery.
- **Licensed Midwives (LMs):** Practitioner who is certified and can render services as an independent provider.
- **Certified Registered Nurse Anesthetists (CRNAs)**

### **I. Medi-Cal Billing Guidelines for NMPs:**

#### **a. Physician Assistants and Nurse Practitioners**

- i. Services rendered by a PA or NP must be performed under the general supervision of a physician(s). The supervising physician need not be physically present, but the supervising physician must be available to the PA in person or through electronic means to provide supervision to the extent required by California professional licensing laws and as established in a practice agreement.
- ii. The supervising physician's provider number must be entered as the rendering physician on each applicable claim line (e.g., Box 19 of the claim).

- iii. PAs, NPs must be enrolled with DHCS Provider Enrollment Division for Medi-Cal reimbursement.
  - iv. Must be credentialed with VHP or VHP's delegated entity for the scope of practice for which they are billing.
- b. Certified Nurse Practitioners, Certified Nurse Midwives and Licensed Midwives
- i. Physician supervision is not required for CNPs, CNMs or LMs.
  - ii. CNPs, CNMs and LMs are authorized to become Medi-Cal providers and render services as independent practitioners.
  - iii. CNMs must be enrolled with DHCS Provider Enrollment Division for Medi-Cal reimbursement.
  - iv. Be licensed as the registered provider by the California Board(s).
  - v. Must be credentialed with VHP or VHP's delegated entity for the scope of practice for which they are billing.
- c. Certified Registered Nurse Anesthetists (CRNAs)
- i. Physicians enter modifier QK on the claim with procedure code when billing for supervision of a CRNA.
  - ii. CRNAs bill anesthesia services rendered with direct supervision of a physician with the appropriate five-digit CPT anesthesia code and modifier QX in conjunction with the appropriate modifier(s).
  - iii. CRNAs bill anesthesia services rendered without direct supervision of a physician with the appropriate five-digit CPT anesthesia code and modifier QZ in conjunction with the appropriate service modifier(s).
  - iv. There are no additional licensing and certification requirements for nurse anesthetists to participate in the Medi-Cal program.
  - v. CRNAs may also bill for pain management and emergency services inside and outside the operating room. CRNA's must use modifier AG when billing with these codes.
  - vi. Must be credentialed with VHP or VHP's delegated entity for the scope of practice for which they are billing.

## **II. Commercial Billing Guidelines for NMPs:**

- a. Physician Assistants
  - i. Be licensed by the State to practice as a physician assistant.
  - ii. Physician supervisor is required, but the physician supervisor (or physician designed) need not be physically present with the PA when a service is being rendered.
  - iii. Must be credentialed with VHP or VHP's delegated entity for the scope of practice for which they are billing.
  
- b. Nurse Practitioners
  - i. Physician supervision is not required for NPs.
  - ii. Be a registered professional nurse who is authorized by the State in which the services are furnished to practice as a nurse practitioner.
  - iii. Must be credentialed with VHP or VHP's delegated entity for the scope of practice for which they are billing.
  
- c. Certified Nurse Midwives
  - i. CNMs can render services as independent practitioners.
  - ii. Have active license to practice in the State as a registered professional nurse.
  - iii. Must be credentialed with VHP or VHP's delegated entity for the scope of practice for which they are billing.
  
- d. Certified Registered Nurse Anesthetists
  - i. Physician supervision is not required for CRNAs.
  - ii. Be licensed as a registered professional nurse by the State in which the nurse practices.
  - iii. Must be credentialed with VHP or VHP's delegated entity for scope of practice for which they are billing.

If you have any questions about how to direct bill for services provided by qualifying mid-level practitioners, please contact VHP Provider Operations at 408-885-2221 or [providerrelations@vhp.sccgov.org](mailto:providerrelations@vhp.sccgov.org).

We appreciate your attention to this matter.