

To: TennCare Managed Care Organizations
From: Keith Gaither, Director Managed Care Operations *KLG*
CC: Chris Morant, Don Oaks, Floyd Price, Mary Shelton,
Shawn Smith; Tammy Gennari
Date: July 11, 2017

Subject: National Provider Identifier Usage for Licensed and Non-licensed Clinician-ADDENDUM

Please know the information that follows has been approved by CMS and serves as an addendum to the TennCare memo, dated July 11, 2016, regarding NPI usage for atypical, non-registered/non-licensed master's level clinicians. In conjunction with TennCare's July 2016 memo, the additional clarification below is effective with all dates of services beginning February 1, 2017.

Scope of Supervision

The scope of supervision must adhere to the supervision requirements outlined in TennCare's revised Information Systems (IS) Policy, titled Provider Identification Usage on Submitted Transactions (see attachment), which states the following:

1. For Behavioral Health Services, services rendered under a plan of care, or a person centered support plan, a minimum of direct supervision is required during service initiation, which may be followed by general supervision for the remainder of the service at the discretion of the supervisory practitioner.
 - a. Direct supervision means the supervising provider must be immediately available to furnish assistance and direction throughout the performance of the procedure.
 - b. General supervision means the service is performed under the supervisory practitioner's overall direction and control but his or her presence is not required during the performance procedure.
2. The minimum supervision requirements outlined above are specific to "incident-to" services and are in addition to the supervision requirements, prescribed by the MCOs, which requires regular, in-person, one-on-one clinical supervision for all non-licensed clinical staff by licensed clinicians.

Billing Using the Supervising Provider's NPI

1. In accordance with the guidance received from CMS, the Supervising Provider's NPI number must be reported in line 24J on the CMS-1500 form. However, it is also appropriate to report the Supervising Provider's information in box 17 (Supervising Provider Name), in which case the Supervising Provider's qualifier (i.e., DQ Qualifier) must be entered to the left of the dotted vertical line in box 17.
2. The Supervising Provider's NPI number must be reported in box 17b. Leave (17a) blank.

For more information regarding Form CMS-1500 instructions, please reference the CMS Publication 100-04 at the following link:

<https://www.cms.gov/Regulations-and-Guidance/Guidance/Transmittals/Downloads/R3083CP.pdf>

Attachments:

1. TennCare IS Policy, Revised April 21, 2017
2. TennCare NPI Memo, July 11, 2016