COMPLIANCE ALERT

TO: Department Chairs, Compliance Leaders, and UFJPI/HI Management

FROM: Maryann C. Palmeter, CPC
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SUBJECT: Florida Medicaid and Services Performed by ARNPs

DATE: August 24, 2006

Page 2-2 of the Florida Medicaid Advanced Registered Nurse Practitioner Services Coverage and Limitations Handbook states that only services designated in Chapter 2 of the Handbook and those listed on the Advanced Registered Nurse Practitioner (ARNP) Procedure Codes and Fee Schedule [formerly in Appendix D] can be reimbursed by Medicaid to an ARNP or to an ARNP under the direct supervision of a physician.

If an ARNP performs a service which is not listed on the ARNP Fee Schedule, and this service is billed to Florida Medicaid under the ARNP’s individual provider number, Florida Medicaid guidelines indicate the service will not be reimbursed. However, the compliance risk to the organization may be increased if the same service is performed by an ARNP but is billed to Florida Medicaid under the supervising physician’s provider number (under direct physician supervision). The compliance risk may increase because the service will be reimbursed as a physician service. The fact that the service was actually performed by an ARNP is invisible to Florida Medicaid’s claim processing system. Florida Medicaid may identify the error if a post-payment review is performed because documentation is requested for post-payment reviews. It may be apparent to Florida Medicaid at the time of review that the service was actually performed by an ARNP but was not a covered ARNP service; thus resulting in a refund request.

The Office of Compliance advises the medical departments, ambulatory administrators and business groups who utilize ARNPs and bill Florida Medicaid for the services of ARNPs (whether directly or under supervision of a physician), to review the ARNP Fee Schedule and determine whether this requirement impacts your normal business operations and billing practices.

Thank you for your assistance in complying with this requirement and sharing this information with faculty, residents, allied health professionals and billing staff in all locations.

cc: Robert Nuss, M.D.
Nancy Frashuer