



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF PUBLIC WELFARE  
P.O. BOX 2675  
HARRISBURG, PENNSYLVANIA 17105

OFFICE OF MEDICAL  
ASSISTANCE PROGRAMS

**MAY 23 2001**

[www.dpw.state.pa.us/omap](http://www.dpw.state.pa.us/omap)

Ms. Rebecca May  
Policy Specialist  
Pennsylvania Community Providers Association  
2400 Park Drive  
Harrisburg, Pennsylvania 17110

Dear Ms. May:

This is in response to your email correspondence dated April 2, 2001, regarding the use of Physician Assistants (PA) and Certified Registered Nurse Practitioners (CRNP) to provide medication management to Medical Assistance (MA) recipients during outpatient psychiatric and outpatient drug and alcohol clinic visits. You requested clarification regarding the following:

- 1. With the advent of new regulations for Nurse Practitioners, and the current regulations guiding Physician Assistants, we would like clarification on approved usage of such professionals for medication management (MA Bulletin 29-99-01).**

The MA Program is governed by both federal and state regulations under 55 Pa. Code §1101.51 9d) (related to Standards of Practice) that state "In addition to licensing standards, every practitioner providing medical care to MA recipients is required to adhere to the basic standards of practice listed in this subsection." Therefore, all providers in the MA Program must abide by the licensing standards (including scope of practice limitation) set forth by the entity licensing them. The MA Program is not permitted to relax the licensing standards and restrictions but may impose additional, more restrictive requirements as deemed appropriate.

The Department of Public Welfare (Department) does not enroll PAs as individual providers in the MA Program. MA regulation Chapter 1141, Sections 11 141.53(f) and 1 141.54(f) state that all covered outpatient and inpatient compensable services provided by a PA, under the direction of a physician, are reimbursable when billed by the enrolled physician, as an office or clinic visit. All services billed to MA must be furnished by the PA in collaboration and under the direction of a physician in accordance with 49 Pa. Code, §18.121 - 18.181.

CRNPs enrolled in the MA Program may independently bill the Department for services permitted under their medical scope of practice and included on the MA Program Fee Schedule. This would include CRNPs providing services as a Provider Type 49 as listed in MA Bulletin 01-94-01, 41-94-01, 48-94-01, 49-94-01, 50-94-01 Outpatient Psychiatric Services for Children Under 21 Years of Age.

In those situations where the CRNP is employed by a hospital, clinic, or physician, the reimbursement is provided to the employer. All services billed to MA must be furnished by the CRNP in collaboration and under the direction of a physician in accordance with 49 Pa. Code, §18.21 - 18.111.

As you stated in your email correspondence, Medication Management Visits for outpatient psychiatric and drug and alcohol clinics were addressed in MA Bulletin 29-9901. In this bulletin, Medication Management Visits were defined for the outpatient psychiatric and drug and alcohol clinic settings. In addition, this bulletin established the following procedure codes for billing purposes:

For outpatient psychiatric clinics:

| <u>TOS</u> | <u>Procedure Code</u> | <u>Terminology</u>          | <u>Fee</u> |
|------------|-----------------------|-----------------------------|------------|
| 70         | W9970                 | Medication Management Visit | \$20.00    |

For outpatient drug and alcohol clinics:

| <u>TOS</u> | <u>Procedure Code</u> | <u>Terminology</u>          | <u>Fee</u> |
|------------|-----------------------|-----------------------------|------------|
| AF         | W9971                 | Medication Management Visit | \$20.00    |

- 2. In bulletin number 01-85-05, "Physician Assistant Use", Medical Assistance states that, "A Physician Assistant may be used to treat Medical Assistance recipients only within the scope of practice of the regulation of the Department of State."**

The issue of regulations guiding PAs was specifically addressed in MA Bulletin 1141-97-01 which states "Current practice standards and licensure requirements of PAs now permit them to provide medical services to patients on behalf of a physician without the direct supervision of that physician as long as the physician is accessible by telephone or some other means of communication.

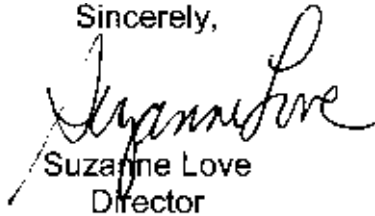
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This extends to inpatient as well as outpatient services." The PA must adhere to requirements regarding the scope of his or her practice as defined by 49 Pa. Code, Subpart A, §18.121-18.181. In addition, the PA must comply with minimum standards for prescribing and dispensing controlled substances specified in 49 Pa. Code, Subpart A, § 16.92 - 16.94, the regulations of the Department of Health related to Controlled Substances, Drugs, Devices and Cosmetics, 28 Pa. Code § 25.51 - 25.58 and 25.91 25.95, and section 4 of the Controlled Substances, Drug, Devices, and Cosmetic Act 35 P.S. § 780 - 104.

I trust this letter addresses your questions. If you should have any further questions or concerns, please feel free to contact Ms. Dawn Poppenwimer, of my staff, at (717) 772-6047.

Sincerely,

A handwritten signature in black ink, appearing to read "Suzanne Love". The signature is written in a cursive style with a large initial "S".

Suzanne Love  
Director

Bureau of Policy, Budget and Planning