

Provider Network News

Provider Enrollment Revalidation Flexibilities: Enrollment Gap Closures, Claims Reprocessing



An Important Message from the Texas Health and Human Services Commission (HHSC)

Background

Medicaid providers are experiencing significant challenges complying with Medicaid provider enrollment revalidation requirements and timelines. In response, HHSC is implementing provider enrollment revalidation flexibilities and requiring all Medicaid and CHIP payers to support these flexibilities. HHSC is taking action to extend revalidation due dates, reduce or eliminate enrollment gaps, and require payers to support claims reprocessing efforts.

These flexibilities are solely in relation to providers who are disenrolled for failure to complete their revalidation in a timely manner. Disenrollments for other reasons, such as voluntary disenrollment; substantiated allegations of fraud, waste, or abuse; or expiration of licenses will continue to occur according to existing business processes.

Key Details

The Texas Medicaid & Healthcare Partnership (TMHP) and HHSC are implementing a process to modify enrollment period effective dates for providers that:

- Have been disenrolled for failing to revalidate between Nov. 1, 2023 and Dec. 12, 2024.
- Successfully re-enrolled in Texas Medicaid.

This process will be implemented in two phases.

Phase 1 Overview:

Beginning Jan. 17, 2025, for providers that meet both the criteria listed above, Phase 1 will result in their National Provider Identifier (NPI) enrollment period begin date in the Provider Enrollment and Management System (PEMS) being backdated up to 365 calendar days. This will reduce or eliminate the provider's enrollment gap impacted by status code 66, "Provider Is Not Enrolled, Failed To Re-Validate."

Providers will receive an email notification with their new NPI enrollment period begin date.

For any providers with draft or in-flight revalidation or re-enrollment requests that are approved after Jan. 17, 2025, the following will apply:

- Their NPI enrollment period begin date in PEMS will be backdated up to 365 calendar days to reduce or eliminate their enrollment gap.
- Status code 66 will be removed up to 365 days after the revalidation or reenrollment is in "closed-enrolled" status.

Phase 2 Overview:

Beginning Feb. 22, 2025, Phase 2 will result in shifting the enrollment period end date back the same number of days that the enrollment period begin date was shifted back. The change to the enrollment period end date will also be reflected as a new revalidation due date to align with state and federal revalidation frequency requirements. Providers will receive an email notification with their new NPI enrollment period end date.

Claims Reprocessing:

For providers who receive a retroactive enrollment gap closure from HHSC and TMHP, HHSC directs all Medicaid and CHIP payers to:

- Allow providers to submit claims for services rendered during the now-closed enrollment gap. Payers must not require a provider to submit the request through formal appeals processes to reduce administrative burden.
- Override timely filing deadlines for impacted claims as applicable.
- Not deny claims during the provider's now-closed enrollment gap for the sole reason that the provider was disenrolled for failure to revalidate in a timely manner (as indicated by a payment denial code 66 [PDC-66] on the master provider file). Payers should follow other claims processing requirements to ensure the legitimacy of services provided.
- Develop and publish the payer's claims reprocessing procedures in a location accessible to any provider, and notify providers of the process for submission of claims during the now-closed enrollment gap.
- Process or reprocess all affected claims before June 30, 2025.

PCHP Added Note: Any change to provider taxonomy would require providers to resubmit new claims.

Questions?

Call the Parkland Community Health Plan Provider Service Line
(Monday – Friday, 8 am – 5 pm CST)

STAR Medicaid: 1-888-672-2277 • CHIP/CHIP Perinate: 1-888-814-2352