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**Supervision & Billing regulations for NP & CNS**Rev. 11/01/14

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Because the changes in the Balance Budget Act of 1997, effective January 1, 1998 allows for billing of a Nurse Practitioner (NP) and Clinical Nurse Specialist (CNS) in our setting, more of the departments are hiring or have hired these types of providers. The purpose of this memo is twofold: 1) to clarify the rules to be followed that support the supervising requirements by the State of Colorado and the different carriers and 2) to address the procedure that coders will need to follow when billing for NPs and CNSs.

In order for UPI to bill for the professional services of a NP or CNS, the provider must be hired through a department of the School of Medicine or School of Nursing with a secondary appointment with the School of Medicine. The NP or CNS cannot be an employee of the hospital. Their salary cannot be from grants or other funds that pay for direct patient care services.

The NP and CNS must also be licensed by the state they are practicing in and perform only those services that are within the scope of their licensure.

Medicare allows for billing of a NP or a CNS in a hospital setting only under a collaboration agreement. Collaboration is defined by Medicare as “a process whereby a NP or CNS works with a physician to deliver services within the scope of their professional expertise with medical direction and appropriate supervision as provided for in jointly developed guidelines or other mechanisms defined by Federal regulations and the law of the state in which the services are performed”.

Therefore a NP or CNS can provide services without direct personal supervision of the physician.

For all NP and CNS providers, Colorado Medicaid requires the services be ordered by a physician but the service may be provided under general supervision of a physician. General supervision shall mean the service is furnished under the physician’s overall direction, but the physician’s presence is not required during the performance of the service.

For all services provided by a **NP or CNS**, billing will be in the name of the practitioner and documentation will require only their electronic signature.

If a carrier, such as a managed care product, needs an identifying physician on a CMS form, it will be applied by UPI’s internal billing system.