

- MEMORANDUM -

DATE: March 10, 2021
TO: All ACBH Specialty Mental Health Services (SMHS) Providers
FROM: Karen Capece, ACBH Quality Management Program Director
SUBJECT: **Update and FAQs - Provider Application and Validation for Enrollment (PAVE)**

This memo and the accompanying frequently asked questions (FAQs) provide additional guidance and clarification aimed at assisting eligible Specialty Mental Health Services (SMHS) practitioners with the required Provider Application and Validation for Enrollment (PAVE) enrollment process, as outlined in [ACBH QA memo dated December 18th, 2020](#).

PAVE Enrollment Requirements for Individual Practitioners

The Department of Health Care Services (DHCS) has further extended the deadline for PAVE enrollment to **July 1, 2021**. Federal Cures Act [42 CFR 438.602(b)] requires PAVE registration for Certified Nurse Practitioners, Licensed Clinical Social Workers, Licensed Marriage and Family Therapists, Licensed Professional Clinical Counselors, Physicians (MD and DO), Psychologists and Registered Pharmacists, who are providing specialty mental health services (SMHS) to Medi-Cal beneficiaries. Interns, trainees, and associates are not eligible for PAVE enrollment. A comprehensive list of individual practitioner and entity types that are eligible and required to register in PAVE can be found on the DHCS Provider Enrollment Division (PED) website: <https://www.dhcs.ca.gov/provgovpart/Pages/Provider-Enrollment-Options.aspx>.

PAVE's Ordering, Referring and Prescribing (ORP) application will fulfill the minimum federal enrollment requirement and, as such, DHCS PED recommends using the **PAVE ORP no-cost application** for eligible licensed individual practitioners listed above. Additionally, ORP providers are not required to meet Medi-Cal's established place of business requirements. Therefore, enrolling as an ORP provider allows licensed individuals to meet the enrollment requirement without submitting a complete billing application. Proof of professional liability insurance is not required for an ORP application. DHCS PED does not limit who can assist with the application process. However, the ORP provider is responsible for their enrollment including signing their application and attesting that all information provided in the application is true and accurate.

- Licensed practitioners described above who are required to enroll, must enroll, regardless of whether they are billing the Medi-Cal program directly. DHCS PED will check to ensure enrollment status via DHCS' Provider Information Management System (PIMS).
 - **Exception:** Licensed individuals who are not providing direct treatment services to SMHS beneficiaries (i.e. administrative or office staff) are not required to enroll in PAVE at this time.
- PAVE ORP application step-by-step tutorial and "how-to" instructions are available starting from slide 23 of the DHCS webinar slide deck: <https://www.dhcs.ca.gov/Documents/Provider-Webinar-9-11-20.pdf>



PAVE Enrollment Requirements for Organizational Entity Providers

SMHS community-based organizations, that are under contract with ACBH, are not required to register in PAVE as group entities as they are not directly providing services to SMHS beneficiaries. However, while ACBH-contracted organizational entities are not required to enroll in PAVE, eligible licensed individuals who provide SMHS on behalf of that entity are required to enroll as individual ORP providers in PAVE, as described in the paragraph above, under “PAVE Enrollment Requirements for Individual Practitioners”.

The only group entities that will need to enroll through PAVE are County Owned-and-Operated Exempt from Licensure Clinics, Exempt from Licensure Clinics intending to become Federally Qualified Health Centers and licensed professionals organized as provider groups. If incorporated, provider groups must be organized as professional corporations per California Corporations Code Section 13401(b). If you are one of these entity types, you would choose the correct entity. If you are not, then you will not enroll through PAVE.

- A comprehensive list of entity provider types that are eligible and required to register in PAVE can be found on the DHCS PED website: <https://www.dhcs.ca.gov/provgovpart/Pages/Provider-Enrollment-Options.aspx>.

ATTACHEMENT:

- **PAVE Enrollment Tips and Frequently Asked Questions**



PAVE Enrollment Tips and Frequently Asked Questions

1. Are there any tips or suggestions on how to make enrolling in PAVE a smoother process for individual practitioners (as described above)?

Have the following information on hand prior to enrolling in PAVE ORP application, as practitioners will be asked to enter this information [PAVE Help Desk at (866) 252-1949 can also assist with Technical Support]:

- NPI number (Depending on when and where an NPI was created for you, the address on the NPPES system may not be your current place of employment and may need to get updated. It might be helpful to review and update information on NPPES first: <https://nppes.cms.hhs.gov/#/>)

In addition, have the following documents ready to scan into PAVE:

- Copy of Current Driver's License or State-issued ID (cannot be expired)
- Professional License (this must be the issued license, not a print-out from the licensing board's website)

2. When enrolling in PAVE, is there a preferred web browser or email address type that practitioners should use?

Using Google Chrome as your web browser is recommended as there have been reports of problems with the website when practitioners are using Internet Explorer. PAVE also recommends that staff use a personal computer when initially enrolling in PAVE as some work and county computers may have firewalls and other security measures that may interfere with completing the PAVE online enrollment. Practitioners have the option of using either their personal or work email address when enrolling in PAVE. Practitioners should use the email address where they want to receive information about PAVE and their application status.

3. What help features are available in PAVE?

Call the PAVE Help Desk at (866) 252-1949, and one of the PAVE friendly experts will be happy to assist you with PAVE enrollment. The Help Desk is available Monday - Friday, 08:00 am - 06:00 pm Pacific time, excluding state holidays. PAVE has been specifically designed for ease of use, and also includes embedded in-context tutorial videos found in PAVE applications, as well as hover-help functionality. PAVE features secure login, document uploading, electronic signature, application progress tracking, intuitive guidance, social collaboration and much more. For additional detailed DHCS training materials, view the following:

- PAVE 101 Training Slides at <https://www.dhcs.ca.gov/provgovpart/Pages/PAVE-101-Training-Slides.aspx>; or
- PAVE Training Videos and other tutorials at <https://www.dhcs.ca.gov/provgovpart/Pages/PAVE.aspx>

4. If I cannot complete the application in one sitting, will I have to start over?

No. You can stop and save your work at any time. Your application will be securely stored in PAVE until you are ready to resume completion.



5. Are individual licensed practitioners who work for county-operated facilities required to enroll via PAVE?

Yes, if they are included in the comprehensive list of providers who are eligible to enroll in the FFS Medi-Cal program on the PED website and are providing services to SMHS beneficiaries, then they are required to enroll. A comprehensive list of individual practitioner and entity types that are eligible and required to register in PAVE can be found on the DHCS PED website: <https://www.dhcs.ca.gov/provgovpart/Pages/Provider-Enrollment-Options.aspx>.

6. Are ACBH-contracted agencies required to enroll?

Contracted legal entities are not required to enroll as they are not directly providing services to SMHS beneficiaries. However, while ACBH-contracted organizational entities are not required to enroll, eligible licensed individuals who provide SMHS on behalf of that entity are required to enroll as individual ORP providers in PAVE, as described in paragraph above, under “PAVE Enrollment Requirements for Individual Practitioners”.

7. Do county-operated outpatient clinics have to enroll in PAVE?

No, unless they fall in “exempt from licensure clinic status.” If the county-operated clinic is [exempt from licensure](#), then they will be required to enroll in PAVE. If the county-operated clinic is not exempt from licensure, then they will enroll through the [CDPH](#).

- Pursuant to Health and Safety Code, section 1200, a “Clinic” is defined as “an organized outpatient health facility that provides direct medical, surgical, dental optometric, or podiatric advice, services, or treatment to patients. A place, establishment or institution that solely provides advice, counseling, information or referrals on the maintenance of health or on the means and measures to prevent or avoid sickness, disease, or injury, where that advice, counseling, information, or referral does not constitute the practice of medicine, surgery, dentistry, optometry, or podiatry, shall not be deemed a clinic for purposes of this chapter.”

DHCS issued a list of Frequently Asked Questions (FAQ) on February 4, 2021 which can be accessed at: [https://www.dhcs.ca.gov/provgovpart/Documents/PAVE Project for Provider Enrollment Division/SMHSEnrollmentFAQFinal.pdf](https://www.dhcs.ca.gov/provgovpart/Documents/PAVE%20Project%20for%20Provider%20Enrollment%20Division/SMHSEnrollmentFAQFinal.pdf)

Please contact Quality Assurance Technical Assistance with any additional questions: QATA@acgov.org.

