

Affected Programs: BadgerCare Plus, Medicaid
To: All Providers, HMOs and Other Managed Care Programs

New Fingerprinting and Criminal Background Check Screening Requirements Due to the Affordable Care Act

ForwardHealth is implementing new requirements for fingerprinting and criminal background check screening for providers classified as high risk. The requirements, which are retroactively effective for provider Medicaid enrollments, re-enrollments, and revalidations submitted on and after August 1, 2015, are part of ForwardHealth's ongoing implementation of the requirements of the Affordable Care Act.

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Providers classified as high risk during Medicaid enrollment, re-enrollment, or revalidation are required to be fingerprinted. This applies to high-risk providers, as well as any person with a 5 percent or more direct or indirect ownership interest in the provider. All providers are responsible for identifying any individuals with 5 percent or more direct or indirect ownership interest to ensure that **all** appropriate individuals are fingerprinted.

As a reminder, ownership interest is the possession of equity in the capital, the stock, or the profits of the disclosing entity. Indirect ownership is an ownership interest in an entity that has an ownership interest in the disclosing entity. This term includes an ownership interest in any entity that has an indirect ownership in the disclosing entity.

High-risk providers are not required to be fingerprinted if they are enrolled in another state Medicaid agency or the Children's Health Insurance Program and have already been fingerprinted or if they are enrolled in Medicare and are considered a high-risk provider by Medicare.

Risk Level Classification

In accordance with ACA, in 2013 ForwardHealth implemented risk level classifications (limited, moderate, or high) assigned by provider type. The risk level classifications have been established by the Centers for Medicare and Medicaid Services (CMS) and ForwardHealth has adopted the same guidelines. In cases where provider types are not classified by CMS, ForwardHealth has established the risk level classifications.

For a list of high-risk provider types and more information regarding risk level classifications, refer to Risk Level Classification by Provider Type in the Provider Enrollment Information area on the ForwardHealth Portal at www.forwardhealth.wi.gov/. To access this page, select Become a

Provider on the left side of the Portal home page, and then select the Risk Level Classification by Provider Type link.

Fingerprinting Process for High-Risk Providers

High-risk providers, as well as any person with a 5 percent or more direct or indirect ownership interest in the provider, will be required to be fingerprinted within 30 calendar days of submitting the Medicaid application, or the application will be denied. Medicaid applications will not be processed until all the fingerprints are submitted.

The Wisconsin Department of Administration has contracted with the company, Fieldprint®, to collect the fingerprints and to submit them to the Wisconsin Department of Justice (DOJ) for processing. After completing the Medicaid enrollment, re-enrollment, or revalidation application, high-risk providers, as well as any person with a 5 percent or more direct or indirect ownership interest in the provider, will be directed to the Fieldprint® website at www.fieldprintwisconsin.com/ to schedule an appointment to be fingerprinted. To schedule an appointment, individuals should access the Fieldprint® website and click the Schedule an Appointment link. Individuals will be prompted to create a secure user account and enter personal and demographic information, including the Wisconsin Medicaid Fieldprint® code and their provider application tracking number (ATN), via the secure Fieldprint® online application. Individuals can then search for a fingerprinting location and schedule an appointment.

Note: Providers receive the Fieldprint® code and their ATN via the Portal when submitting their enrollment, re-enrollment, or revalidation application.

Individuals will be required to pay a fee of \$7.75 for fingerprinting. The fee is collected when the fingerprinting appointment is scheduled with Fieldprint®. The fee may be adjusted in the future.

Providers should contact Fieldprint® by telephone at 877-614-4364 or via email at Customer.Service@fieldprint.com with any questions regarding the fingerprinting process.

Note: Providers should continue to contact Provider Services at 800-947-9627 for provider enrollment questions.

Fingerprint-Based Criminal Background Check

Once individuals are fingerprinted by Fieldprint®, Fieldprint® will send the fingerprints to the Wisconsin DOJ to perform fingerprint-based criminal background checks.

Providers will be denied enrollment if they or any person with a 5 percent or more direct or indirect ownership interest in the provider have been convicted of a criminal offense related to their involvement with Medicare, Medicaid, or the Children's Health Insurance Program in the last 10 years.

Notifying High-Risk Providers Who Enrolled, Re-enrolled, or Revalidated on and After August 1, 2015

High-risk providers who enrolled, re-enrolled, or revalidated in Wisconsin Medicaid on and after August 1, 2015, and who have not been fingerprinted will be required to undergo fingerprinting and criminal background checks retroactively. Affected providers will receive a letter from ForwardHealth that notifies them of the requirement to be fingerprinted. Providers will have 30 calendar days from the date on the letter to be fingerprinted, or their enrollment with Wisconsin Medicaid will be terminated.

The *ForwardHealth Update* is the first source of program policy and billing information for providers.

Wisconsin Medicaid, BadgerCare Plus, SeniorCare, and Wisconsin Chronic Disease Program are administered by the Division of Health Care Access and Accountability, Wisconsin Department of Health Services (DHS). The Wisconsin AIDS Drug Assistance Program and the Wisconsin Well Woman Program are administered by the Division of Public Health, Wisconsin DHS.

For questions, call Provider Services at 800-947-9627 or visit our website at www.forwardhealth.wi.gov/.

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