

ForwardHealth **UPDATE**

Wisconsin serving you

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PHYSICIAN ASSISTANTS CAN BILL AS SEPARATE PROVIDERS

For dates of service on and after June 1, 2025, physician assistants can submit claims to ForwardHealth as billing providers. Prior to June 1, 2025, physician assistants were rendering-only providers.

This ForwardHealth Update contains information about:

- [Physician Assistant Enrollment](#).
- [Physician Assistant Services](#).
- [Practice Policy](#).
- [Claims Submission](#).

Physician Assistant Enrollment

Currently enrolled physician assistants who plan to bill ForwardHealth will need to upload their tax information to the [demographic maintenance tool](#) before submitting claims to ForwardHealth, but they will not need to re-enroll.

AFFECTED PROGRAMS

BadgerCare Plus, Medicaid

TO

HealthCheck Providers, Physician Assistants, Physician Clinics, Physicians, Podiatrists, HMOs and Other Managed Care Programs.

The information provided in this ForwardHealth Update is published in accordance with Wisconsin Act 23 and Wis. Stat. § 448.971.

New providers and providers seeking to [re-enroll](#) must follow the steps outlined on the [Provider Enrollment Information](#) page of the ForwardHealth Portal (the Portal). Physician assistants may find specific enrollment information on the [Information for Specific Provider Types](#) page of the Portal.

For assistance and questions about the enrollment process, providers may call Provider Services at 800-947-9627.

Physician Assistant Services

A physician assistant may provide the same types of services that a physician would provide, such as diagnostic, palliative, preventative, rehabilitative, and therapeutic services. Examples of these types of services include:

- Conducting examinations
- Offering treatment
- Prescribing, ordering, procuring, dispensing, and administering medications, medical devices, services, and supplies
- Performing surgery
- Providing medical advice
- Serving as primary care and specialty care providers
- Delegating a care task to another clinically trained health care worker

The physician is not required to be present when the physician assistant renders a service.

Physician assistants must practice within their legal scope of practice under Wis. Stat. § [448.975](#) and are required to maintain current information about themselves on the Portal using the [demographic maintenance tool](#). Physician assistants should make sure their information is up to date before submitting claims to ForwardHealth.

Practice Policy

In compliance with [2021 Wisconsin Act 23](#) and the [Physician Assistant Affiliated Credentialing Board](#), ForwardHealth requires physician assistants to have either:

- Evidence there is a physician who is primarily responsible for the overall direction and management of the physician assistant's professional activities and who assures that the services provided by the physician assistant are medically appropriate as outlined in 2021 Wisconsin Act 23 and Wis. Admin. Code ch. [PA 3](#)

QUICK LINKS

- [User Guides](#) page
- Physician Assistants topic [#23797](#)

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- A collaborative practice agreement with a physician that describes the physician assistant's individual scope of practice

Collaborative Practice Agreement

A [collaborative practice agreement](#) policy is a formal agreement created by and between a physician and a physician assistant that is submitted to the [Physician Assistant Affiliated Credentialing Board](#) upon request.

ForwardHealth may recoup payment for services provided by a physician assistant without a current collaborative practice agreement or a comparable agreement that meets program requirements.

The collaborative practice agreement must include:

- The name and license number of the physician entering the agreement.
- The name and license number of the physician assistant entering the agreement.
- A description of the physician assistant's individual scope of practice.
- A clause that specifies:
 - The collaborating physician shall remain reasonably available to the physician assistant using telecommunications or other electronic means within a medically appropriate time frame.
 - The collaborating physician may choose an alternative collaborator when unavailable.
- An arrangement for identifying an alternative collaborating physician for when the collaborating physician or the physician's designee is not available for consultation.
- An arrangement for physician consultation with the patient within a medically appropriate time frame for consultation, if requested by the physician assistant's patient.
- The specific time limit of the agreement.
- The signature and date of the physician entering into the agreement.
- The signature and date of the physician assistant entering into the agreement.
- Other requirements identified by the physician assistant credentialing board.

Note: Either the physician or physician assistant may terminate the agreement by providing written notice 30 days in advance.

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Collaborate Practice Agreement Requirements

ForwardHealth requires the physician(s) and physician assistant(s) listed on a collaborative practice agreement to review the agreement every three years. The physician(s) and physician assistant(s) listed in the agreement must [maintain current Medicaid enrollment status](#) for the agreement to remain valid. To maintain enrollment, providers must go through Medicaid Provider revalidation, which occurs every three years.

Physician assistants who receive Medicaid reimbursement:

- May be audited at any time.
- Must retain relevant documentation supporting adherence to program requirements and submit it to ForwardHealth upon request.

Claims Submission

Billing providers are responsible for the accuracy and completeness of all claims submitted either by the provider or an outside billing service or clearinghouse. ForwardHealth requires that all codes indicated on claims and prior authorization (PA) requests be valid, including:

- Diagnosis codes.
- Revenue codes.
- Healthcare Common Procedure Coding System (HCPCS) codes.
- Health Insurance Prospective Payment System (HIPPS) codes.
- Current Procedural Terminology (CPT) codes.

Providers should refer to current national coding and billing manuals for information on valid code sets. ForwardHealth will:

- Deny claims received without valid diagnosis codes, revenue codes, and HCPCS, HIPPS, or CPT codes.
- Return PA requests received without valid codes to the provider.

Refer to the ForwardHealth Online Handbook Electronic Claim Submission topic [#344](#) and Paper Claim Submission topic [#642](#) for more information about claims submission.

Documentation Retention

Providers are reminded that they must follow the documentation retention requirements per Wis. Admin. Code § [DHS 106.02\(9\)](#). Providers are required to produce or submit documentation, or both, to the Wisconsin Department of Health Services (DHS) upon request. Per Wis. Stat. § [49.45\(3\)\(f\)](#), providers of

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services shall maintain records as required by DHS for verification of provider claims for reimbursement. DHS may audit such records to verify the actual provision of services and the appropriateness and accuracy of claims. DHS may deny or recoup payment for services that fail to meet these requirements. Refusal to produce documentation may result in denial of submitted claims, recoupment of paid claims, application of intermediate sanctions, or termination from the Medicaid program.

Information Regarding Managed Care Organizations

This Update applies to physician assistant services that members receive on a fee-for-service basis and through BadgerCare Plus, Medicaid SSI, and other managed care programs. For information about managed care implementation of the updated policy, contact the appropriate managed care organization.

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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 Medicaid Services within the Wisconsin Department of Health Services (DHS). The Wisconsin HIV Drug Assistance Program and the Wisconsin Well Woman Program are administered by the Division of Public Health within DHS.

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