



State of New Mexico
Medical Assistance Program Manual
Supplement



DATE: June 22, 2026

Number: 26-03

TO: ICF/IID PROVIDERS

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SUBJECT: ICF/IID CLAIMS – RECOUPMENT OF CLAIMS WITH IDENTICAL BILLING AND ATTENDING PROVIDER NPIs

Overview

The New Mexico Health Care Authority (HCA), Medical Assistance Division (MAD) has identified through the Payment Error Rate Measurement (PERM) program administered by the Centers for Medicare & Medicaid Services (CMS) that some claims submitted by Intermediate Care Facilities for Individuals with Intellectual Disabilities (ICF/IIDs) reported the same National Provider Identifier (NPI) for both the billing provider and the attending provider.

Federal Medicaid program integrity requirements established under Section 6401 of the Affordable Care Act and implemented through 42 CFR §455.410 require that providers who order, refer, or prescribe services for Medicaid recipients be enrolled with the Medicaid program. These requirements are intended to ensure that services provided to Medicaid beneficiaries originate from properly licensed providers who are enrolled in Medicaid and who have not been excluded from participation in federal health care programs.

Background

The Medical Assistance Division previously issued billing guidance through [MAD Supplement 17-07](#) establishing requirements for reporting attending, ordering, referring, rendering, and prescribing providers on claims. Under this guidance, institutional providers, including ICF/IIDs, must report the ordering or referring practitioner in the attending provider field on the UB institutional claim format.

[MAD Supplement 17-07](#) also established that, effective January 1, 2018, attending, referring, ordering, or rendering providers must be enrolled as current providers in the Medicaid or Managed Care programs. For ICF/IID claims:

1. Adjustment requests for prior claims received on or after January 1, 2018, without the required attending provider information will be denied.
2. Claims for which the attending provider is not enrolled in Medicaid or in the managed care program will be denied for dates of service on or after January 1, 2018.

3. This enrollment requirement ensures that the attending provider reported on ICF/IID claims is authorized to provide Medicaid services, even if the provider is part of a group or facility.

The attending provider field must identify the individual practitioner responsible for the recipient's care. This provider must be separate from the billing provider which is the ICF/IID facility. Because the attending provider must be an individual practitioner, the attending provider National Provider Identifier (NPI) cannot be the same as the billing facility NPI. Claims submitted with the same NPI listed for both the billing provider and the attending provider are not compliant with federal Medicaid requirements.

[MAD Supplement 17-07](#) further specifies that claims will be denied when the attending provider NPI field is blank, not in a valid NPI format, or matches the billing facility NPI.

PERM Findings and Corrective Action

CMS recently issued official notice to New Mexico regarding the state's Reporting Year 2025 Medicaid and CHIP improper payment rates identified through the PERM program. CMS requires states to address identified errors through corrective actions and to recover the federal share of Medicaid and CHIP overpayments identified through the PERM review process on a claim-by-claim basis.

As part of New Mexico's response to the Reporting Year 2025 PERM findings, the state is required to submit a Corrective Action Plan addressing identified errors. CMS expects states to implement program integrity measures designed to reduce improper payments and strengthen compliance with federal billing requirements.

MAD Action

To support the state's PERM corrective actions and ensure compliance with federal requirements and previously issued MAD billing guidance, MAD will implement retrospective monthly reviews of ICF/IID claims submitted on or after May 1, 2026.

These reviews will identify claims where the billing provider NPI which is the ICF/IID facility NPI, and the attending provider NPI are reported as the same. Claims identified through these reviews that were paid in error will be considered non-compliant with federal Medicaid billing requirements and may be subject to recoupment.

ICF/IID Responsibilities for Claim Submission

ICF/IID providers are responsible for accurately reporting the attending provider on claims. This includes ensuring that the attending provider:

- Is an enrolled individual practitioner with Medicaid or the managed care program, in accordance with federal requirements.
- Is an individual practitioner responsible for the recipient's care.
- Is not the same as the billing provider (ICF/IID facility) NPI.

For ICF/IID providers submitting claims through the new Turquoise Claims system at YES.NM.GOV, the billing provider (ICF/IID) NPI is auto-populated for providers enrolled in the Turquoise Claims system. The system also includes an *Attending Provider* field where the attending provider NPI must be entered by the billing provider.

Electronic Data Interchange (EDI) submissions through clearinghouses remain unchanged.

Paper claim submission processes also remain unchanged; however, claims must be mailed to the address below and cannot be dropped off:

Turquoise Claims
P.O. Box 930
Bernalillo, NM 87004

ICF/IID providers should review their billing practices and internal processes to ensure accurate and complete Attending Provider field information is included on all claims. Failure to comply may result in claim denials or recoupments.

Questions

If you need additional help determining whether an attending provider is enrolled in the Medicaid program, you may contact the Consolidated Customer Service Center (CCSC), Provider Relations 800-299-7304 or nm.providers@hca.nm.gov

Training and resources for the new Turquoise Claims system are available through the YES New Mexico Learning Management System under the Turquoise Claims Institutional Claims section, including instructor-led trainings, self-paced courses, user guides, and job aids.

If you have questions regarding the information in this Supplement, you may contact the Health Care Authority TCInfo@hca.nm.gov or call 1-800-283-4465.