

DATE: November 3, 2023 N.L.: 07-1023
Index: Program Administration

TO: All County California Children's Services Program Administrators,
Medical Directors and Consultants, and Integrated Systems of Care
Division Staff

SUBJECT: Requirements for Nurse Practitioners in California Children's Services
Special Care Centers

I. PURPOSE

The purpose of this Numbered Letter (NL) is to disseminate training, experience, and practice requirements for nurse practitioners (NP) providing services to California Children's Services (CCS) Program beneficiaries in CCS Program Special Care Centers (SCC). This NL does not address practice requirements for NPs outside of CCS Program SCC.

II. BACKGROUND

The intent of the CCS Program is to ensure CCS-eligible beneficiaries are provided the medically necessary medical services related to the CCS-eligible conditions. The Department of Health Care Services (DHCS) has oversight of the services provided under CCS Program to assure a high quality of service.^{1,2}

CCS Program SCC are hospital-affiliated pediatric centers that provide specialty care to beneficiaries with CCS-medically eligible conditions. Care is provided by a multidisciplinary team, under the direction of a medical director who is a CCS-paneled pediatric subspecialist with expertise in managing the CCS-medically eligible conditions. Health & Safety Code Section 123929(a) mandates prior authorization of CCS Program services contingent on the following criteria:

- A. The client receiving the services is confirmed to be medically eligible for the CCS Program;
- B. The provider of the services is approved in accordance with the standards of the CCS Program; and

¹ Health & Saf. Code §§ 123805, 123825, & 123925

² Part 2 - Medi-Cal Program & Eligibility Manual, Medi-Cal Non-Physician Medical Practitioners
[Non-Physician Medical Practitioners \(NMP\) \(non ph\)](#)



C. The services authorized are medically necessary to treat the CCS-eligible medical condition.

Nurse practitioners are optional members of the SCC multidisciplinary core team. As a core team member, the NP functions according to CCS Program policy. The scope of practice for NPs in California has expanded under Code (BPC) Sections 2837.103 and 2837.104 with the addition of two new categories of NPs: the 103 and 104 NP.³ ⁴ With special certification granted by the California Board of Registered Nursing (BRN), the 103 and 104 NP can function within a defined scope of practice without standardized procedures.⁵ The 103 NP works under the provisions outlined in BPC Section 2837.103. The 103 NP works in a group setting with at least one physician and surgeon within the population focus of their NP certification.⁶ The 104 NP works under the provisions outlined in BPC Section 2837.104. The 104 NP may work independently within the population focus of their NP certification.⁷ Education, training, certification, regulatory, and medical staff governance requirements for the 103 and 104 NP are defined in BPC Sections 2837.103 and 2837.104.^{8, 9, 10, 11}

This CCS Program NL policy describes the scope of NPs working in a CCS Program SCC and does not apply to the scope of NPs outside of CCS SCC. Participation in the CCS Program as a pediatric nurse practitioner (PNP), family nurse practitioner (FNP), or neonatal nurse practitioner (NNP), including NPs certified by the California BRN as a 103 or 104 NP, is limited to serving as a designated core member of a multidisciplinary team.¹² This NL addresses requirements for NPs in CCS Program SCC that are primarily outpatient. NP requirements for CCS Program inpatient SCC are delineated in the neonatal intensive care unit (NICU), pediatric intensive care unit (PICU), and pediatric acute rehabilitation unit standards.¹³

³ Bus. & Prof. Code § 2837.103

⁴ Bus. & Prof. Code § 2837.104

⁵ Cal. Code Regs., tit. 16, § 1480(k)

⁶ Bus. & Prof. Code § 2837.103 (c)(1)

⁷ Bus. & Prof. Code § 2837.104 (c)(1)

⁸ Part 2 - Medi-Cal Program & Eligibility Manual, Medi-Cal Non-Physician Medical Practitioners [Non-Physician Medical Practitioners \(NMP\) \(non ph\)](#)

⁹ Bus. & Prof. Code § 2837.103

¹⁰ Bus. & Prof. Code § 2837.104

¹¹ Bus. & Prof. Code § 2836

¹² CCS Program Chapter 3.37.1 Provider Core Standards, SCC General Information and Core Standards [Provider Standards \(ca.gov\)](#)

¹³ Provider Standards, Chapters 3.25 NICU & 3.32 PICU Standards [Provider Standards \(ca.gov\)](#)

Within the CCS Program, client care is provided under the supervision of the SCC medical director.^{14, 15, 16} The intent of the CCS Program is to ensure CCS-eligible beneficiaries are provided the medically necessary services to correct or ameliorate the CCS-eligible conditions.¹⁷ Under CCS Program, “medically necessary benefits” are “those services, equipment, tests, and drugs which are required to meet the medical needs of the client’s CCS-eligible medical condition as prescribed, ordered, or requested by a CCS Program physician and which are approved within the scope of benefits provided by the CCS Program”.¹⁸

In addition, CCS Program requires that the CCS-paneled physician evaluate each client in-person during the initial team visit and at least annually.¹⁹

III. POLICY

A. California NP Training and Experience Requirements

Medi-Cal providers who employ or use the services of a NP who is not 103 or 104 certified are required to develop a written description of NP practice and physician supervision guided by standardized procedures.^{20, 21} Standardized procedures establish the means by which medical treatment services provided by physicians and NPs are integrated and made consistent with accepted medical practice.^{22, 23, 24}

¹⁴ Part 2 - Medi-Cal Program & Eligibility Manual, Medi-Cal Non-Physician Medical Practitioners [Non-Physician Medical Practitioners \(NMP\) \(non ph\)](#)

¹⁵ CCS Program Chapter 3.37.1 Provider Core Standards, SCC General Information and Core Standards [Provider Standards \(ca.gov\)](#)

¹⁶ CCS Program Standards Chapters 3.3.1-3.3.4, Tertiary, Community, and Special Hospitals [Provider Standards \(ca.gov\)](#)

¹⁷ Health & Saf. Code §§ 123825 & 123929

¹⁸ Cal. Code Regs., tit. 22, § 41452

¹⁹ CCS Program Chapter 3.37.1 Provider Core Standards, SCC General Information and Core Standards [Provider Standards \(ca.gov\)](#)

²⁰ Bus. & Prof. Code § 2725

²¹ Cal. Code Regs. Tit. 16, § 1480

²² Part 2 - Medi-Cal Program & Eligibility Manual, Medi-Cal Non-Physician Medical Practitioners [Non-Physician Medical Practitioners \(NMP\) \(non ph\)](#)

²³ Bus. & Prof. Code § 2725

²⁴ Bus. & Prof. Code §§ 2834-2837

B. CCS Program SCC Program Requirements for NP Participation

As a team member, NPs must be CCS-paneled in order to provide care to CCS Program beneficiaries. A NP can apply to become CCS-paneled by submitting a paneling application through the CCS Program Paneling Portal website.^{25, 26}

1. The CCS Program paneling requirements for all NPs are as follows:^{27, 28}
 - a. Be licensed as a registered nurse (RN) and certified as a PNP, FNP, or NNP by the California Board of Registered Nursing (BRN);²⁹
 - b. Be certified as a primary care or acute care PNP by the Pediatric Nursing Certification Board, certified as a FNP by the American Academy of Nurse Practitioners or the American Nurses Credentialing Center; or as a NNP by the National Certification Corporation.^{30, 31, 32, 33}
 - c. Have an individual National Provider Identifier (NPI) enrolled with Medi-Cal;^{34, 35} and
 - d. Have a minimum of two years post-training experience as a NP providing direct client care, with at least one year providing services to infants, children, and/or adolescents with CCS-eligible medical conditions.

All NPs must have either:

- i. A minimum of 1 year of experience providing services to beneficiaries with CCS-eligible medical conditions as a PNP, FNP, or NNP in a specialty-specific practice setting led by a pediatric subspecialist; or

²⁵ The CCS Paneling Portal <https://cmsprovider.cahwnet.gov/PANEL/index.jsp>

²⁶ CCS Program Individual Provider Paneling Application for Allied Health Care Professionals [Individual Provider Paneling Application for Allied Health Care Professionals](#)

²⁷ Provider Paneling Program Requirements by Provider Type

<https://cmsprovider.cahwnet.gov/NEL/provider-paneling-standards.jsp>

²⁸ Becoming a California Children's Services Provider [Becoming a CCS Provider \(ca.gov\)](#)

²⁹ California Board of Registered Nursing <https://www.rn.ca.gov/>

³⁰ Pediatric Nursing Certification Board (PNCB) <https://www.pncb.org/>

³¹ American Academy of Nurse Practitioners <https://www.aanpcert.org/>

³² American Nurses Credentialing Center (ANCC) <https://www.nursingworld.org/ancc/>

³³ National Certification Corporation <https://www.nccwebsite.org/>

³⁴ The CCS Program Paneling Portal <https://cmsprovider.cahwnet.gov/PANEL/index.jsp>

³⁵ Provider Paneling Program Requirements by Provider Type

<https://cmsprovider.cahwnet.gov/NEL/provider-paneling-standards.jsp>

- ii. A minimum of 2 years of experience as a designated RN core member of a multidisciplinary, multispecialty team providing care to beneficiaries with CCS-eligible medical conditions.
2. All SCC must have written policies and procedures that describe the requirements applicable to NPs in CCS Program SCC as detailed in this NL and in the CCS Program SCC Core Standards, 3.37.1.³⁶ All SCC must also have standards applicable to the NPs practice in the SCC specialty. Integrated Systems of Care Division (ISCD) must approve all policies and procedures upon SCC approval, and during re-certification.^{37, 38}
3. NPs working in SCC who are not 103 or 104 certified are required to practice pursuant to standardized procedures.³⁹ According to California Code of Regulations Title 16, Section 1474, NP standardized procedures must:
 - a. Be in writing, dated, and signed by the organized health care system personnel authorized to approve it.
 - b. Specify which standardized procedure functions registered nurses may perform and under what circumstances.
 - c. State any specific requirements which are to be followed by registered nurses in performing particular standardized procedure functions.
 - d. Specify any experience, training, and/or education requirements for performance of standardized procedure functions.
 - e. Establish a method for initial and continuing evaluation of the competence of those registered nurses authorized to perform standardized procedure functions.
 - f. Provide for a method of maintaining a written record of those persons authorized to perform standardized procedure functions.
 - g. Specify the scope of supervision required for performance of standardized procedure functions, for example, telephone contact with the physician.

³⁶ CCS Program Chapter 3.37.1 Provider Core Standards, SCC General Information and Core Standards [Provider Standards \(ca.gov\)](#)

³⁷ Health & Saf. Code § 123925

³⁸ CCS Program Chapter 3.37.1 Provider Core Standards, SCC General Information and Core Standards [Provider Standards \(ca.gov\)](#)

³⁹ Bus. & Prof. Code § 2725

- h. Set forth any specialized circumstances under which the registered nurse is to immediately communicate with a beneficiaries physician concerning the beneficiaries condition.
 - i. State the limitations on settings, if any, in which standardized procedure functions may be performed.
 - j. Specify beneficiary record-keeping requirements.
 - k. Provide for a method of periodic review of the standardized procedures.
4. Standardized procedures must be kept on file at the provider's office, readily available for review by DHCS and the independent CCS Program county upon request.⁴⁰
5. For the purposes of the CCS Program, 103 NPs may practice without standardized procedures when the NP:^{41, 42, 43}
 - a. Has passed a national nurse practitioner board certification examination and obtained special certification as delineated in BPC Section 2837.103;
 - b. Has been certified by the California BRN as a 103 NP.
6. For the purposes of the CCS Program, 104 NPs may practice without standardized procedures when the NP:^{44, 45}
 - a. Has met the requirements delineated in BPC Section 2837.104; and
 - b. Has been certified by the California BRN as a 104 NP.
7. All NPs who practice in SCC must demonstrate proof of compliance with these requirements. An expired certification or lack of proof of the requirements referenced above will result in the denial of an application.⁴⁶

⁴⁰ Health & Saf. Code § 123925

⁴¹ Bus. & Prof. Code § 2837.103

⁴² Cal. Code Regs., tit. 16, § 1480(k)

⁴³ Bus. & Prof. Code § 2836

⁴⁴ Bus. & Prof. Code § 2837.104

⁴⁵ Bus. & Prof. Code § 2836

⁴⁶ CCS Program Chapter 3.37.1 Provider Core Standards, SCC General Information and Core Standards
[Provider Standards \(ca.gov\)](https://www.ca.gov)

8. If the CCS Program determines that there has been non-compliance with the SCC written policy, the CCS SCC NP requirements detailed in this NL, or other applicable law, then the CCS Program will conduct a review of the facility.^{47, 48}

C. CCS SCC NP Oversight Requirements

1. Physician signature for NP assessment/plan of care

- a. The SCC policy regarding scope of practice for the NP who is not 103 or 104 certified includes that a CCS-paneled supervising physician from the SCC core team must review and cosign medical record documentation performed by the NP.^{49, 50, 51} The physician's signature signifies acceptance of and responsibility for the NP's assessment and plan of care.^{52, 53}

- b. Site-specific requirements:

- i. Inpatient:

- (1) NICU and PICU- physician signature is required within 24 hours.

- (2) Physician signature in CCS-approved hospitals is required within 24 hours.⁵⁴

- (3) In pediatric acute rehabilitation units- physician signature is required within 72 hours.

- ii. Outpatient:

⁴⁷ CCS Program Chapter 3.37.1 Provider Core Standards, SCC General Information and Core Standards [Provider Standards \(ca.gov\)](#)

⁴⁸ Health & Saf. Code § 123925

⁴⁹ Part 2 - Medi-Cal Program & Eligibility Manual, Medi-Cal Non-Physician Medical Practitioners [Non-Physician Medical Practitioners \(NMP\) \(non ph\)](#)

⁵⁰ Cal. Code Regs., tit. 22, § 41452

⁵¹ Bus. & Prof. Code § 2725

⁵² Part 2 - Medi-Cal Program & Eligibility Manual, Medi-Cal Non-Physician Medical Practitioners [Non-Physician Medical Practitioners \(NMP\) \(non ph\)](#)

⁵³ Cal. Code Regs., tit. 16, § 1379

⁵⁴ CCS Program Standards Chapter 3.3, Hospitals [Provider Standards \(ca.gov\)](#)

- (1) CCS-paneled physician co-signature is not required for client assessment with a continuation of the physician plan of care.
- (2) CCS-paneled physician signature is required within 72 hours when there is a change to the plan of care in all outpatient SCC settings.

2. NP Prescriptions

- a. NPs are permitted to furnish or issue an order or prescription, or request a CCS service may do so only if the NP is enrolled in Medi-Cal as an Ordering, Referring, and Prescribing (ORP) provider,^{55, 56, 57, 58, 59, 60} and:
 - i. The order, prescription, or service is clearly referenced in the SCC physician plan of care and the NP has clear delegated authority for continuing specific medications (which may include a new brand of same item), DME, and/or supplies until the plan of care is updated,^{61, 62, 63, 64, 65} and
 - ii. Is within the established legal framework of the NP scope of practice and follows specific requirements set forth by the SCC Program.^{66, 67, 68, 69, 70}

⁵⁵ Ordering, Referring, and Prescribing (ORP)
[Provider Enrollment and Responsibilities \(prov enroll res\) \(ca.gov\) /Ordering, Referring, Prescribing, Providers \(ca.gov\)](#)

⁵⁶ Bus. & Prof. Code § 2837.103(c)(4)

⁵⁷ Bus. & Prof. Code § 2837.103.5

⁵⁸ Bus. & Prof. Code § 2837.104(a)(1)

⁵⁹ Bus. & Prof. Code § 2836.1

⁶⁰ Ordering, Referring, and Prescribing (ORP)
[Provider Enrollment and Responsibilities \(prov enroll res\) \(ca.gov\) /Ordering, Referring, Prescribing, Providers \(ca.gov\)](#)

⁶¹ Bus. & Prof. Code § 2837.103(c)(4)

⁶² Bus. & Prof. Code § 2837.103.5

⁶³ Bus. & Prof. Code § 2837.104(a)(1)

⁶⁴ Cal. Code Regs., tit. 22, § 41452

⁶⁵ Bus. & Prof. Code § 2725

⁶⁶ Part 2 - Medi-Cal Program & Eligibility Manual, Medi-Cal Non-Physician Medical Practitioners
[Non-Physician Medical Practitioners \(NMP\) \(non ph\)](#)

⁶⁷ Bus. & Prof. Code § 2837.103

⁶⁸ Bus. & Prof. Code § 2837.104

⁶⁹ Bus. & Prof. Code § 2725

⁷⁰ Cal. Code Regs., tit. 22, § 1485

- b. 103 and 104 NPs prescribing services under the SCC physician plan of care must include their full name and license number as listed in the California BRN website on the service order, including orders for prescriptions, DME, and supplies.⁷¹
 - c. New or modified prescriptions ordered by any NP must be approved by a SCC physician and the documentation in the client's medical records must reflect the physician's request.⁷²
 - d. Any prescription, order, or request by any NP service that falls outside the scope of the SCC physician's ordered plan of care must not be entitled to coverage under the CCS Program.^{73, 74}
3. All NPs must refer to a CCS-paneled physician pursuant to BPC Section 2725(b)(4), Section 2837.103(f), and Section 2837.104(c)(4)(A)-(E), as applicable.

If a referral is necessary, the CCS-paneled physician must document in a separate client visit note that the physician has directly evaluated and developed the client's plan of care.

4. Inpatient SCC have additional requirements. For practice in these specific CCS-approved SCC, including NICU, PICU, and pediatric acute rehabilitation unit, a NP must comply with requirements delineated in applicable CCS Standards and NLs.^{75, 76}

D. Reimbursement for NP Services

NPs who are not 103 or 104 certified are enrolled as Medi-Cal ORP-only providers and cannot bill directly for independent office or inpatient visits. Reimbursement for services rendered by a NP who is

⁷¹ Cal. Code Regs., tit. 22, § 1485

⁷² Part 2 - Medi-Cal Program & Eligibility Manual, Medi-Cal Non-Physician Medical Practitioners [Non-Physician Medical Practitioners \(NMP\) \(non ph\)](#)

⁷³ Health & Safety Code §§ 123805, 123825, & 123925

⁷⁴ Part 2 - Medi-Cal Program & Eligibility Manual, Medi-Cal Non-Physician Medical Practitioners [Non-Physician Medical Practitioners \(NMP\) \(non ph\)](#)

⁷⁵ Provider Standards, Chapters 3.25 NICU & 3.32 PICU Standards [Provider Standards \(ca.gov\)](#)

⁷⁶ CCS Program Numbered Letters <https://www.dhcs.ca.gov/services/ccs/Pages/CCSNL.aspx>

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not 103 or 104 certified can be made only to the employing physician, organized outpatient clinic, or hospital outpatient department.^{77, 78}

Reimbursement for services rendered by 103 and 104 certified NPs can be made to the NP when the conditions specified in Sections C.2 and D. are followed.^{79, 80}

If you have any questions regarding this N.L., contact ISCD-MedicalPolicy@dhcs.ca.gov.

Sincerely,

ORIGINAL SIGNED BY

Cortney Maslyn, Chief
Integrated Systems of Care Division
Department of Health Care Services

⁷⁷ Part 2 - Medi-Cal Program & Eligibility Manual, Medi-Cal Non-Physician Medical Practitioners [Non-Physician Medical Practitioners \(NMP\) \(non ph\)](#)

⁷⁸ Ordering, Referring, and Prescribing (ORP) [Provider Enrollment and Responsibilities \(prov enroll res\) \(ca.gov\) /Ordering Referring Prescribing Providers \(ca.gov\)](#)

⁷⁹ Part 2 - Medi-Cal Program & Eligibility Manual, Medi-Cal Non-Physician Medical Practitioners [Non-Physician Medical Practitioners \(NMP\) \(non ph\)](#)

⁸⁰ Ordering, Referring, and Prescribing (ORP) [Provider Enrollment and Responsibilities \(prov enroll res\) \(ca.gov\) /Ordering, Referring, Prescribing, Providers \(ca.gov\)](#)