

New Medicaid Requirements for Ordering, Prescribing or Referring Providers An Overview

Traditionally, most providers have enrolled in the Georgia Medicaid program to furnish covered services to Medicaid beneficiaries and to submit claims for such services. However, the Affordable Care Act (ACA) now requires physicians or other eligible practitioners to enroll in the Medicaid Program to order, prescribe and refer items or services for Medicaid beneficiaries, even when they do not submit claims to Medicaid.¹ Physicians and other practitioners who order, prescribe or refer items or services for Medicaid beneficiaries, but who choose not to submit claims to Medicaid, are referred to throughout these FAQs as “OPR providers.”

The new enrollment requirement for OPR providers does not include a requirement to see Medicaid patients or to be listed as a Medicaid provider for patient assignments or referrals.

Instead, the ACA requires OPR providers to enroll only to meet new ACA program integrity requirements designed to ensure all orders, prescriptions or referrals for items or services for Medicaid beneficiaries originate from appropriately licensed practitioners who have not been excluded from Medicare or Medicaid.

Physicians or other eligible professionals who are already enrolled in Medicaid as participating providers and who submit claims to Medicaid are not required to enroll separately as OPR providers. It is applicable only to Georgia physicians and other eligible professionals who are OPR providers but are not currently enrolled in Georgia Medicaid.

It is important for OPR providers to understand the implications of failing to enroll in Medicaid. If you are an OPR provider, the physicians, other practitioners and facilities who actually render services to Medicaid beneficiaries based on your order, prescription or referral, will not be paid for such items or services unless you enroll in Medicaid and your National Provider Identifier (NPI) number is included on the claim submitted to Medicaid by the rendering provider.²

Remember, enrolling in Medicaid as an OPR provider:

- ***Does not obligate you to see Medicaid patients;***
- ***Does not mean you will be listed as a Medicaid provider for patient assignment or referral;***
- ***Does not require an annual renewal;***
- ***Allows you to continue to see Medicaid patients without billing the Medicaid program if you so choose; and,***
- ***Helps ensure that your orders, prescriptions and referrals for Medicaid patients are accepted and processed appropriately.***

¹ 42 CFR 455.410(b) provides that the state Medicaid agency must require all ordering, prescribing, or referring physicians or other eligible professionals providing services under the State Plan, or under a waiver of the Plan, to be enrolled as participating providers.

² 42 CFR 455.440 provides that the state Medicaid agency must require all claims for the payment for items and services that were ordered, prescribed, or referred to contain the National Provider Identifier (NPI) of the physician or other professional who ordered, prescribed, or referred such items or services.

Important OPR Dates

Effective April 1, 2013, OPR providers began enrolling in the Georgia Medicaid OPR Provider program.

Pharmacy Claims

Beginning August 1, 2013, DCH will edit **pharmacy** claims for the presence of an enrolled OPR provider and will notify pharmacies through the claims transaction if the submitted prescribing provider is not enrolled with DCH as either an OPR or rendering provider. Beginning October 1, 2013, pharmacy claims will be denied if the prescribing provider is not enrolled as an OPR or rendering provider with DCH.

Other Services Claims

DCH will begin OPR editing for claims for all other categories of service at a later date.

Failure to Enroll and Requirements for Medicaid Reimbursement for Rendering Providers Who Submit Medicaid Claims

Again, beginning August 1, 2013, all **pharmacy** claims must contain the NPI of the ordering, prescribing or referring provider. Pharmacies will receive a claims message if that provider is not enrolled in Georgia Medicaid between August 1, 2013, and September 30, 2013.

If you are a provider who has rendered services to a Fee-for-Service (FFS) Medicaid beneficiary, there are three basic requirements for the NPI number included on your submitted claims.

1. The NPI number must belong to a physician or non-physician practitioner who is enrolled in Georgia Medicaid as either a participating Medicaid provider or as an OPR provider.
2. The NPI number submitted on the claim must be for an individual physician or non-physician practitioner (not an organizational NPI).
3. The physician or non-physician practitioner must be of a specialty type that is eligible to order, prescribe, or refer (See Q&A 15 below).

Enrollment of OPR Providers

On April 1, 2013, DCH began accepting enrollment applications for OPR providers, i.e., physicians or other practitioners eligible to enroll in Georgia Medicaid for the sole purpose of ordering, prescribing, or referring items or services for Medicaid beneficiaries but not submitting claims to Medicaid. The submission and approval of a completed individual practitioner enrollment application will enroll the physician or other eligible practitioner in the Medicaid Program for the sole purpose of OPR-specific services for Medicaid beneficiaries. The following Frequently Asked Questions provide enrollment education for OPR providers subject to the new ACA requirements.

For questions or additional information, e-mail OPREnrollment@dch.ga.gov.

Frequently Asked Questions for New Medicaid Requirements for Ordering, Prescribing or Referring Providers

1. Why is Georgia Medicaid requiring OPR providers to enroll?

The ACA places additional program integrity requirements on state Medicaid agencies. Georgia Medicaid is complying with federal regulation 42 CFR 455.410 regarding the screening and enrollment of providers.

2. What are the requirements for OPR?

There are three basic requirements for OPR:

- The physician or non-physician practitioner who wrote the order, prescription or referral must be enrolled in Medicaid as either a participating Medicaid provider or as an OPR provider and his or her NPI number must be included on the claim.
- The provider's NPI number must be for an individual physician or non-physician practitioner (not an organizational NPI).
- The physician or non-physician practitioner must be of a specialty type that is eligible to order, prescribe, or refer.

3. I am currently enrolled as an active provider with Georgia Medicaid. Do I also need to enroll as an OPR provider?

No. Providers already enrolled as active Medicaid participating providers do not need to enroll again as OPR providers.

4. How does the OPR provider enroll as a Georgia Medicaid provider?

Georgia Medicaid has an online enrollment process. OPR providers may enroll in Medicaid through the Georgia Medicaid Management Information System (GAMMIS) Web Portal at: <https://www.mmis.georgia.gov/portal/default.aspx>. For expedited enrollment, providers should enroll online by:

- Clicking on Provider Enrollment.
- Clicking on Enrollment Wizard (scroll to bottom of screen).
- Clicking on Provider Enrollment Application.
- Clicking on New Application.
- For Request Type, select Ordering, Prescribing, or Referring (OPR).

After the application is completed and has been submitted, you will receive an Automated Tracking Number (ATN).

To upload a copy of your license and DEA Registration, if applicable:

- Click on Provider Enrollment.

- Click on Enrollment Application Status.
- Type ATN and Last Name of Provider and click on Search.
- Click on Upload Required Documents.
- Click on pertinent Attachment Description.
- Attach a digital copy of your license and DEA Registration, if applicable.

To check the status of your application:

- Click on Provider Enrollment.
- Click on Enrollment Application Status.
- Type in your ATN and Last Name of Provider and click on Search.

5. Is there a separate enrollment application for OPR providers?

Yes. DCH has created online and paper applications strictly for OPR providers.

6. If I am strictly an OPR provider, why do I have to accept the terms of the Medicaid Statement of Participation agreement on the enrollment application since I do not submit claims?

All providers, regardless of what services they perform, are required to sign a Statement of Participation. A new Statement of Participation has been created specifically for OPR providers. The OPR Statement of Participation does NOT require the provider to accept Medicaid enrollees or bill Medicaid for his or her services.

7. What if the provider needs a National Provider Identifier (NPI) number?

The provider will need to obtain an individual NPI number before enrolling as an OPR provider. The federal government issues NPIs for health care providers at the following website:

<https://nppes.cms.hhs.gov/NPPES/Welcome.do>

8. What if the provider is enrolled with another state's Medicaid program? Will the provider need to enroll in all states in which he or she provides services?

Yes. Enrollment in another state's Medicaid program does not exempt an OPR provider from the requirement to enroll in the Georgia Medicaid program. As federally mandated, providers are required to enroll in each state where they order, prescribe, refer or render services to Medicaid enrollees.

For example, if a physician located in Alabama and enrolled in the Alabama Medicaid program writes a prescription or orders a test for a Georgia Medicaid beneficiary, the Alabama physician must be enrolled in the Georgia Medicaid program or the claim submitted by the Georgia provider that filled the prescription or performed the test will be denied.

9. How does the Medicaid provider who is rendering the service know the NPI of the OPR provider? Once the provider knows the NPI of the OPR provider, how can they tell if the OPR provider is enrolled in the Georgia Medicaid program?

It is ultimately the responsibility of the Medicaid provider rendering the service to obtain the NPI of the OPR provider and confirm that the OPR provider is enrolled in the Georgia Medicaid program.

Each Medicaid provider will need to develop its own internal processes to ensure the enrollment requirement is met or the provider risks the claims being denied. The Georgia Medicaid Management Information System (GAMMIS) Web Portal at <https://www.mmis.georgia.gov> has a search capability so individuals and entities will be able determine if an OPR provider is enrolled in Georgia Medicaid.

DCH suggests that pharmacies and other providers require any ordering, prescribing or referring provider to include their NPI on any prescription/order/referral he or she writes. This will allow the provider filling the prescription or performing the ordered service to verify the provider's Medicaid enrollment, either as a participating Medicaid provider or as an OPR provider, before preparing the claim.

For retail pharmacies filling a prescription for medication, simply bill the claim using your point-of-sale (POS) system with the NPI of the prescriber. If the prescriber is not enrolled with Medicaid, you will receive a claim rejection that informs you of the prescriber's status.

10. If a claim is denied because the OPR provider is not currently enrolled in the Medicaid program, can the OPR provider enroll retroactively?

Yes. DCH has amended its retroactive enrollment policy for OPR providers to allow the billing provider to re-submit the claim provided the OPR provider submits their enrollment application within 60 days of the date of service.

11. Do claims submitted to the Medicaid Care Management Organizations (CMO) have to follow the OPR requirement?

Yes. Georgia Medicaid requires that NPIs for OPR providers be included on all Care Management Organization claims.

12. If the NPI number on the claim is for a provider who is not enrolled in Georgia Medicaid, when will the claim denials start?

Denials for claims submitted without the NPI number of a provider enrolled in the Georgia Medicaid Program, either as a participating Medicaid provider or as an OPR provider, will begin with claims submitted for claims processing by Medicaid later this year. The start date for claims processed by the MMIS vendor, HPES, will be announced at a future date.

Editing for pharmacy claims that are processed through point-of-sale (POS) by Catamaran will begin on August 1, 2013. Pharmacy claims will edited in a non-denial or "message only" status until October 1, 2013.

13. If I am a specialist, and a provider who is not enrolled in the Medicaid program refers a Medicaid enrollee to my practice for care, will my claim be denied if the provider does not enroll as an OPR provider and the claim is processed for payment by Medicaid later this year?

Yes.

14. Is Georgia Medicaid following the CMS policy on the types of providers who can refer?

Yes. Georgia Medicaid is complying with federal regulation 42CFR 455.410 and following those guidelines.

15. Does Georgia Medicaid have a list of types of providers who can OPR?

Yes. Medicaid does have a list of types of providers who can be OPR providers. See below.

FAQ

Providers who can Order/Refer are:

Doctor of Medicine or Osteopathy - Contract 430
Dental Medicine - Contract 450/460
Dental Surgery - Contract 490
Podiatric Medicine - Contract 550
Optometry - Contract 470
Physician Assistant - Contract 431
Nurse Practitioner - Contract 740
Clinical Psychologist - Contract 570
Certified Nurse Midwife - Contract 480
Clinical Social Worker - Contract 840
Audiologist - Contract 840

Providers who can Prescribe are:

Doctor of Medicine or Osteopathy - Contract 430
Dental Medicine - Contract 450/460
Dental Surgery - Contract 490
Podiatric Medicine - Contract 550
Optometry - Contract 470
Physician Assistant - Contract 431
Nurse Practitioner - Contract 740

Providers who cannot Prescribe are:

Clinical Psychologist - Contract 570
Certified Nurse Midwife - Contract 480
Clinical Social Worker - Contract 840
Audiologist - Contract 840

Specialty Contract Codes:

Prescribing - 701
Referring - 702
Ordering - 703

16. What are the types of NPIs? How can I verify which type of NPI I have?

There are two types of NPIs: Type 1 and Type 2. An individual's NPI is deemed a Type 1. An organization's NPI is deemed a Type 2.

NOTE: Only Type 1 NPIs can be used for OPR purposes. Again, you may verify your NPI at <https://npiregistry.cms.hhs.gov/NPPERegistry/NPIRegistryHome.do>

17. Our hospital is a teaching hospital with “resident physicians” who are not eligible to enroll in the Medicaid Program. Whose NPI number should we report on the claim as the OPR provider?

To comply with the requirement, providers who do not have NPIs or who are not authorized to enroll as a Medicaid or CHIP provider (i.e. medical residents at hospitals holding temporary postgraduate training permits) must apply the NPI of the supervising or attending physician to the claim. If the resident is fully licensed and meets the requirements for full licensure, he or she should obtain an NPI and Medicaid ID in order to order, prescribe, refer or bill for services.

18. Am I required to be enrolled at each service location where I perform OPR services?

Yes. OPR providers are required to be enrolled at each physical service location where they see Medicaid beneficiaries. Once enrolled, OPR providers will follow the same enrollment process as described previously for each location in which they order, prescribe, or refer services for Medicaid beneficiaries.

19. If a provider has applied to be an OPR provider and has received a Medicaid Automated Tracking Number (ATN) but has not yet been notified of his/her enrollment by HPES, can the provider order, prescribe or refer a Medicaid beneficiary and will the rendering provider's claims be paid?

Yes, if the application is approved. Otherwise, the effective date of enrollment will be the first day of the month in which the application was received.

20. What is the estimated turnaround time at HPES for a provider to be fully enrolled as an OPR Provider once the completed application has been submitted?

Once the application and license are received and there are no errors, HPES will normally enroll the provider within 10 business days.

21. How will providers report the OPR provider for a billed service?

Georgia Medicaid is requiring all claims for items and services that were ordered, prescribed, or referred to contain the NPI of the licensed health care professional ordering, prescribing or referring the service. Fee-for-Service providers should refer to the appropriate provider manual for information pertaining to claims submissions.

22. If Georgia Medicaid is secondary to commercial insurance, would the claim be accepted without an enrolled ordering, prescribing, or referring provider requirement?

No. The enrollment requirement also applies if Medicaid is being billed as secondary to commercial insurance.

23. Do Medicare crossover claims require the OPR provider to be enrolled?

Yes. Medicare crossover claims are subject to the enrollment requirement.

24. Does a provider have to be enrolled as a participating provider or can he or she be enrolled only as an OPR provider?

If a provider will only be ordering, prescribing or referring items or services for Medicaid beneficiaries and does not wish to bill Medicaid for any services provided to Medicaid beneficiaries, the provider may enroll as an OPR provider only. OPR providers do not bill Medicaid and are not obligated to treat Medicaid patients. Some examples of providers who may wish to enroll as OPR providers only are charity-care providers, emergency-room physicians, hospitalists, and physicians or other practitioners employed by the Veterans Administration.

Providers should remember that if they enroll as OPR providers, they do not bill Georgia Medicaid directly for any services rendered to Medicaid beneficiaries. If a provider desires to bill Medicaid, he or she must enroll as a full participating Medicaid provider.

25. Some charity-care providers, who are not enrolled as Medicaid providers, provide services to Medicaid patients in areas where access to services is limited. These charity-care providers are an important part of the safety net, particularly in areas and specialties with low provider participation in Medicaid. Can Medicaid continue to pay for prescriptions and other services ordered by non-enrolled charity-care providers?

No. All OPR providers will be required to be enrolled with the Medicaid program if they continue to order, prescribe, or refer services for Medicaid beneficiaries. If they do not, then the rendering provider will not be paid.

26. If a Georgia Medicaid beneficiary is out-of-state and receives services in an emergency room or hospital, can the prescriptions or orders written by the out-of-state provider be reimbursed by Georgia Medicaid?

Yes, but they are subject to the OPR requirements. Federal law requires all OPR physicians or other professionals rendering services under the State Plan to be enrolled as providers. The provider that ordered, prescribed, or referred the services must be enrolled in the Medicaid program in which the beneficiary is eligible, in this case Georgia Medicaid. The NPI of the out-of-state OPR provider must be included on the claim for payment to the provider rendering the services ordered, prescribed, or referred. Therefore, a provider outside Georgia who orders, prescribes, or refers services must be enrolled in the Georgia Medicaid program for Georgia Medicaid to pay the claim of the participating provider who actually renders the service. This includes physicians or other professionals employed at hospitals or other health care facilities.

27. Who should I contact if I have questions regarding enrollment?

Providers should contact Medicaid's fiscal agent Hewlett-Packard Enterprise Services (HPES) at 800-766-4456, press option #0. For questions or additional information, e-mail OPREnrollment@dch.ga.gov.