



Ordering/Referring/ Prescribing Licensed Healthcare Professionals

New Enrollment Requirement for Licensed
Healthcare Professionals Who May Order, Refer
or Prescribe Medicine, Items or Services for
Medi-Cal Members



Background



Traditionally, most health care providers have enrolled in the Medi-Cal program to provide covered health services to Medi-Cal members.

With the implementation of the Patient Protection and Affordable Care Act (ACA) of 2010, many providers must now enroll in Medicare or Medi-Cal for the sole purpose of ordering, referring or prescribing services for Medi-Cal members. These ordering, referring or prescribing (ORP) providers do not submit claims directly to Medi-Cal for reimbursement for the services they provide and this type of enrollment does **not** allow the Medi-Cal program to reimburse the ORP provider for services provided directly to Medi-Cal members.

Patient Protection and Affordable Care Act

In accordance with federal Medicaid regulations and ACA, the Department of Health Care Services (DHCS) has established a requirement for the Medi-Cal program to enroll ORP providers.

Federal Medicaid Regulations

- 42 CFR §455.410(b) requires all ordering or referring physicians or other professionals providing services, under the State Plan or under a waiver of the plan to be enrolled as participating providers.
- 42 CFR §455.440 requires all claims for items and services ordered or referred to contain the National Provider Identifier (NPI) of the ordering or referring provider.

California Statutes

Welfare and Institutions Code (W&I Code) requires ORP providers, as defined in §14043.1(b) and (o), to enroll as participating providers in the Medi-Cal program. W&I Code §14043.15(b)(3) provides that the ORP provider's NPI must be listed on all claims for reimbursement.

Who can order, refer or prescribe for Medi-Cal members?

There are three requirements for ordering, referring or prescribing services for Medi-Cal members:

1. The ORP provider must be enrolled in Medi-Cal or Medicare.
2. The ORP provider must have a Type 1 (individual) NPI, not a Type 2 (organization) NPI.
3. The ORP provider must be eligible to order, refer and/or prescribe in accordance with law and the health care practitioner's practice act.



What Application Form should I use to be a Medi-Cal ORP-Only Provider?

If not enrolling in Medicare, providers must submit the *Medi-Cal Ordering/Referring/Prescribing Provider Application/Agreement/Disclosure Statement for Physician and Non-physician Practitioners (DHCS 6219)*.

Providers already enrolled in Medi-Cal or Medicare with their Type 1 (individual) NPI do not need to enroll again as an ORP provider.

DHCS has 90 days to review Medi-Cal ORP provider applications from medical doctors or osteopathic physicians and notify the applicant of its action, pursuant to W&I Code, §14043.26(g).

DHCS has 180 days to review Medi-Cal ORP provider applications from non-physician practitioners and notify the applicant of its action pursuant to W&I Code, §14043.26(f).

Failure to Enroll

Anticipated in 2016, if the ORP provider's name and NPI on the billing provider's claim is not enrolled in the Medi-Cal program or Medicare, **claims from the "filling providers" will be denied.**



In addition, Medi-Cal members may not receive needed items or services, if the "filling providers or suppliers" refuse to accept orders, referrals or prescriptions from providers who are not enrolled.

Frequently Asked Questions

Q: If I do not want to be an enrolled Medi-Cal provider or be reimbursed for my services, do I still need to enroll in Medi-Cal as an ORP provider?

A: Yes. If you order, refer or prescribe items or services to Medi-Cal members, you must enroll as an ORP provider.

Q: I am already enrolled in Medi-Cal or Medicare with my Type 1 (individual) NPI. Do I need to enroll again as a Medi-Cal ORP provider so I can order, refer or prescribe?

A: No. You do not have to enroll again if you are enrolled with your Type 1 NPI.

Q: I am already enrolled in Medi-Cal or Medicare with my Type 2 (organization) NPI. Do I need to enroll again as a Medi-Cal ORP provider so I can order, refer or prescribe?

A: Yes. If you are currently enrolled with your Type 2 NPI, you must enroll in Medicare or Medi-Cal with your Type 1 NPI for the sole purpose of ordering, referring or prescribing items or services to Medi-Cal members.

Q: If I enroll as a Medi-Cal ORP provider, will I be able to bill Medi-Cal directly for services that I provide?

A: No. Medi-Cal ORP providers enroll solely for the purpose of ordering, referring or prescribing items or services for Medi-Cal members. To bill Medi-Cal directly for services provided, you must submit a full application package as required by the Medi-Cal program and enroll as a Medi-Cal provider.

Q: How do we report a "resident physician"?

A: Interns and non-licensed residents do not qualify to enroll as Medi-Cal ORP providers. They must use the NPI of the teaching, admitting or supervising physician on the reimbursement claim form.



Additional ordering, referring and prescribing provider information is available at:
www.dhcs.ca.gov/provgovpart/Pages/PED.aspx

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