



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.

However, with the implementation of the Patient Protection and Affordable Care Act (ACA), many providers must now enroll in the Medicare or Medi-Cal programs 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.

Affordable Care Act

In accordance with federal Medicaid regulations, 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), Sections 14043.1(b) and (o) require the enrollment of ORP providers as participating providers in the Medi-Cal program. W&I Code, Section 14043.15(b)(3) provides that the NPI of the ORP provider must be listed on all claims for reimbursement.

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

There are three basic 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's enrolled NPI must be for an individual (not an organizational 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 a Medi-Cal ORP provider application through the Provider Application and Validation for Enrollment (PAVE) Portal or 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, pursuant to W&I Code, Section 14043.26(g) and notify the applicant of DHCS' action.

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

Failure to Enroll

If the ORP provider's NPI on the billing provider's claim is not enrolled in the Medi-Cal program or Medicare, **claims from the "filling providers" (for example, pharmacies, DME providers, etc.) will be denied.**



Medi-Cal members may not receive needed items or services, if the "filling providers or suppliers" refuse to accept orders or referrals 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. Failure to enroll can result in the order, referral or prescription being denied and the patient not able to receive the services.

Q: I am currently enrolled as an active (Type 1) provider with Medi-Cal. Do I need to enroll as an ORP provider?

A: No. Providers already enrolled as active (Type 1) Medi-Cal billing or rendering providers do not need to enroll again as an ORP provider.

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 by accessing the PAVE Portal at: <https://pave.dhcs.ca.gov/sso/login.do>

Go to www.medi-cal.ca.gov for additional ORP FAQs



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

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