



Ordering/Referring/ Prescribing Licensed Healthcare Professionals

New Enrollment Requirement for Licensed Healthcare Professionals Who May Order, Refer, or Prescribe Medicines, 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, 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 provider must be enrolled in Medi-Cal or Medicare.
2. The ORP provider's NPI must be for an individual (not an organizational NPI).
3. The 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 ordering, referring, or prescribing 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 name or NPI on the claim of the billing provider is not enrolled in the Medi-Cal program or Medicare, **claims from the "filling providers" (for example, pharmacies, DMEs, 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 as a Medi-Cal 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 with 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 with 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 with 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 can be found at:
<http://www.dhcs.ca.gov/provgovpart/Pages/PED.aspx>

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