

Traditionally, most providers have enrolled in the Mississippi Medicaid program to furnish covered services to Medicaid beneficiaries and to submit claims for such services. However, 42 CFR 455.410(b) of the Affordable Care Act (ACA) requires state Medicaid agencies enroll all ordering, referring or prescribing physicians and other eligible professionals providing services under the State Plan or under a waiver of the State Plan. Physicians and other eligible practitioners, who order, refer or prescribe items or services for Medicaid beneficiaries but who choose **not** to submit claims to Medicaid are referred to in these FAQs as “ORP providers”.

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

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 as ORP providers. It is only applicable to Mississippi physicians and other eligible professionals who order, refer and prescribe items or services for Medicaid beneficiaries but are not currently enrolled in MS Medicaid.

It is important for ORP providers to understand the implications of failing to enroll in Medicaid. Claims submitted by providers who actually render services to Medicaid beneficiaries based on your order, referral, or prescription **will be denied** for such items or services unless you, the ORP Provider is enrolled in Medicaid and your National Provider Identifier (NPI) number is included on the claim submitted to Medicaid by the rendering provider.

Important ORP Dates

Effective January 1, 2014, ORP providers will begin enrolling in the Mississippi Medicaid ORP provider program.

Pharmacy Claims

Beginning January 1, 2014, first time claims received for non-Medicaid providers “with a date written” on or after January 1, 2014, will post NCPDP Reject `56-Non Matched Prescriber ID’ with the accompanying message *‘FEDERAL LAW REQUIRES THAT ALL MEDICAID PRESCRIBERS ARE ENROLLED AS A MEDICAID PROVIDER. NPI SUBMITTED ON CLAIM MUST BE THE ACTUAL PRESCRIBER ON THE PRESCRIPTION (RX); ANY OTHER IS CONSIDERED FRAUD’*. Pharmacy claims will not actually start denying until April 1, 2014 and after.

After January 1, 2014, if the Prescriber’s NPI number is not enrolled with Medicaid as a valid and/or active provider, that prescriber will have a grace period of 90 days to enroll. If the prescriber does not enroll during their 90 day grace period, then on the 91st day and thereafter their Medicaid prescriptions will deny.

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

1. Why is Mississippi Medicaid requiring ORP providers to enroll?

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

2. What are the requirements for ORP?

There are three basic requirements for ORP:

- a. The physician or other eligible professional who ordered, referred or prescribed must be enrolled in Medicaid as either a participating Medicaid provider or as an ORP provider and his or her NPI number must be included on the claim.
- b. The provider's NPI number must be for an individual physician or eligible professional (not an organizational NPI).
- c. The physician or eligible professional must be a specialty type that is eligible to order, refer or prescribe.

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

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

4. How does the ORP provider enroll as a Mississippi Medicaid provider?

Mississippi Medicaid has an online enrollment process. ORP providers may enroll through the Envision Web Portal at: <https://msmedicaid.acs-inc.com/msenvision/>. For expedited enrollment, providers should enroll online.

5. 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 ORP provider from the requirements to enroll in the Mississippi Medicaid program. As federally mandated, providers are required to enroll in each state where they order, refer or prescribe or render services to Medicaid beneficiaries.

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

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

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

Each Medicaid provider will need to develop its own internal processes to ensure the enrollment is met or the provider risks the claims being denied. The secure side of the Mississippi Envision web portal located at <https://msmedicaid.acs-inc.com/msenvision/> has a search option for the rendering provider to determine if the ORP provider is enrolled in Mississippi Medicaid.

MS Medicaid suggests that pharmacies and other providers require any ordering, referring or prescribing 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 ORP 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 provider is not enrolled with Medicaid, you will receive a claim rejection that informs you of the prescriber's status.

7. 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 ORP provider and the claim is processed for payment by Medicaid later this year?

Yes.

8. 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 ORP purposes. You may verify your NPI at <https://npiregistry.cms.hhs.gov/NPPESRegistry/NPIRegistryHome.do>.

9. If a provider completes the short form (ORP) application, can the provider use this ORP Medicaid number to submit claims to Medicaid for payment?

No. This application is for the sole purpose of ordering/referring/prescribing items and services for MS Medicaid beneficiaries. This type of enrollment does not allow MS Medicaid to reimburse the applicant/provider for services provided. If the applicant wishes to be reimbursed for services performed, he/she must submit a full application package as required by MS Medicaid.

10. Our hospital is a teaching hospital with "resident physicians" who are either not enrolled as a participating Medicaid provider or who are enrolled as a participating provider but based on their license cannot prescribe. Whose NPI number should we report on the claim as the ORP provider?

To comply with the requirement, providers who do not have NPIs and who are not authorized to enroll as a Medicaid provider must apply the NPI of the supervising physician to the claim. If the resident is enrolled as a participating provider but his/her license does not allow them to prescribe, the NPI of the supervising physician is required on the claim.

11. What is the estimated turnaround time for an ORP provider to be fully enrolled once the completed application has been submitted?

Once the application is complete and without errors, the ORP provider will normally be enrolled within 21 business days.

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

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

13. Do Medicare crossover claims require the ORP provider to be enrolled?

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

14. Some charity-care providers, who are not enrolled as Medicaid providers, provide services to Medicaid beneficiaries 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 ORP providers will be required to be enrolled with the Medicaid program if they continue to order, refer or prescribe services for Medicaid beneficiaries. If they do not, then the rendering provider will not be paid.

15. If a Mississippi 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 Mississippi Medicaid?

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

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

Providers should contact Medicaid's fiscal agent, Conduent, at 800-884-3222.

17. What is the role of the pharmacist for pharmacy point of sale (POS) claims?

- a. Enter the correct NPI for the prescriber. It is imperative that the NPI on the claim be the prescriber of the prescription. Any other NPI used is considered fraud.
- b. Remind prescribers to enroll if you continue to see NCPDP Reject – '56-Non Matched Prescriber ID' on that prescriber's claims.