



Ordering, Prescribing and Referring Provider Enrollment Frequently Asked Questions

Introduction

With the implementation of the Patient Protection and Affordable Care Act, the Centers for Medicare & Medicaid Services (CMS) requires all ordering, prescribing and referring physicians to be enrolled in the state Medicaid program (42 CFR §455.410 Enrollment and Screening of Providers). Traditionally, most providers have enrolled in the Nevada Medicaid program to furnish covered services to Medicaid recipients 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 recipients, even when they do not submit claims to Medicaid.

The new requirement for Ordering, Prescribing and Referring (OPR) providers to be enrolled in Nevada Medicaid will be implemented on August 18, 2014.

OPR providers do not bill Nevada Medicaid for services rendered, but may order, prescribe or refer services/supplies for Medicaid recipients. For Medicaid to reimburse for services or medical supplies resulting from a practitioner's order, prescription or referral, the OPR provider must be enrolled in Medicaid. Enrolling as an OPR provider is appropriate for practitioners who:

- May occasionally see an individual who is a Medicaid recipient who needs additional services or supplies that will be covered by the Medicaid program
- Do not want to be enrolled as another Nevada Medicaid provider type
- Do not plan to submit claims for payment of services rendered

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 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 recipients 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) is included on the claim submitted to Medicaid by the rendering provider (42 CFR 455.440).

Effective with claims received by Nevada Medicaid on or after October 15, 2014, the NPI of the OPR provider must be included on all Nevada Medicaid/Nevada Check Up claims.

Please note that the requirement extends to pharmacy Point of Sale (POS) systems as well. The POS system will deny, at the time of the pharmacy transaction, any claims submitted for a Medicaid recipient with a prescriber who is not enrolled as a Medicaid provider.

Please review the following FAQs frequently as they will be updated periodically.

1. Why is Nevada Medicaid requiring OPR providers to become enrolled?

The ACA places additional program integrity requirements on state Medicaid agencies. Nevada 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 (3) basic requirements for OPR:



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- a) 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 must be included on the claim.
 - b) The provider's NPI must be for an individual physician or non-physician practitioner (not an organizational NPI).
 - c) 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 Nevada 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 an OPR provider.
- 4. Is there a separate enrollment application for OPR providers? How does the OPR provider enroll in Nevada Medicaid?**
- Yes, a separate enrollment application has been created specifically for OPR providers. The new application is available on the Provider Enrollment webpage at <http://www.medicaid.nv.gov/providers/enroll.aspx>. OPR providers enroll by submitting the new OPR enrollment application.
- 5. What date can OPR providers begin submitting applications for enrollment?**
- OPR providers may begin submitting applications for enrollment on July 21, 2014.
- 6. What if the provider needs a National Provider Identifier (NPI)?**
- The provider will need to obtain an individual NPI before enrolling as an OPR provider. The federal government issues NPIs for health care providers. Please visit the following website for information: <https://nppes.cms.hhs.gov/NPPES/Welcome.do>
- 7. 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. You may verify your NPI at: <https://npiregistry.cms.hhs.gov/NPPESRegistry/NPIRegistryHome.do>
- 8. 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 Nevada 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 Nevada 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.
- A suggestion is for pharmacies and other providers to require any ordering, prescribing or referring provider to include their NPI on any prescription/order/referral he or she writes.



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For retail pharmacies filling a prescription for medication, simply bill the claim using your Point-of-Sale system with the NPI of the prescriber. A “soft” edit will be placed before implementation. A “soft” edit is an informative message that appears at the point of dispensing, but does not cause a claim rejection. A web announcement will be published (at www.medicaid.nv.gov) once the “soft” edits are implemented. A “hard” edit will be placed once the “soft” edit expires, and if the prescriber is not enrolled with Medicaid, you will receive a claim rejection that informs you of the prescriber’s status. Paper claims sent by a pharmacy will also be subject to the OPR “soft” and “hard” edits.

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

Yes. Nevada Medicaid can backdate enrollment up to 6 months. The billing provider can resubmit the claim after the OPR provider is enrolled within claim timely filing limitations, which are 180 days from date of service for in-state providers and 365 days from date of service for out-of-state providers and third party liability (TPL) claims.

10. Do claims submitted to the Managed Care Organizations (MCOs) have to follow the OPR requirement?

No. This new requirement does not apply to orders, prescriptions or referrals for individuals enrolled in a Nevada Medicaid MCO. It is applicable only to the Nevada Fee-for-Service (FFS) Medicaid program.

11. If the NPI on the claim is for an OPR provider who is not enrolled in Nevada Medicaid, when will the claim denials start?

Effective with claims received by Nevada Medicaid on or after October 15, 2014, the National Provider Identifier (NPI) of the Ordering, Prescribing or Referring (OPR) provider must be included on all Nevada Medicaid/Nevada Check Up claims **or those claims will be denied.**

12. Is Nevada Medicaid following the CMS policy on the types of providers that can refer?

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

13. Does Nevada Medicaid have a list of types of providers that can order, prescribe and refer?

Yes. The physician or non-physician practitioner must be of a provider/specialty type that is eligible to order and refer. These individual provider types include, but are not limited to:

- Certified Nurse Midwives (provider type 74)
- Clinical Psychologists (provider type 26, specialty 162)
- Clinical Social Workers (provider type 14, specialty 305)
- Nurse Practitioners (provider type 24)
- Optometrists may only order and refer laboratory and X-Ray services payable under Medicare Part B and DMEPOS products/services (provider type 25)
- Physician’s Assistants (provider type 77)
- Physicians (Doctors of Medicine or Osteopathy, Doctors of Dental Medicine, Doctors of Dental Surgery, Doctors of Podiatric Medicine or Doctors of Optometry) (provider type 20)
- Interns, Residents and Fellows*

* Interns, residents and fellows are only allowed to enroll in Nevada Medicaid as an OPR physician and are not permitted to bill for services rendered to Nevada Medicaid recipients.



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

No. Nevada Medicaid allows only one enrollment per NPI.

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

Nevada 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 claim form instructions for information pertaining to claims submissions.

16. 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 recipients and does not wish to bill Medicaid for any services provided to Medicaid recipients, the provider may enroll as an OPR provider only. OPR providers do not bill Medicaid and are not obligated to treat Medicaid recipients.

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

17. 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 service?

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

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

18. If a Nevada Medicaid recipient 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 Nevada Medicaid? The out-of-state hospital will often enroll with Nevada Medicaid to receive reimbursement for the hospital visit by the Medicaid beneficiary, but it is unlikely that the individual physician prescriber will enroll. How will Nevada Medicaid accommodate out-of-state prescriptions or orders?

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 patient is eligible, in this case Nevada 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 of Nevada who orders, prescribes or refers services must be enrolled in the Nevada Medicaid program for Nevada 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.



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

Contact the Nevada Medicaid fiscal agent DXC Technology, which is referred to as Nevada Medicaid, at (877) 638-3472. Select the options for Provider Enrollment (option 2, then option 0, then option 5).