

Ordering, Prescribing or Referring Providers (OPR) Required to Enroll in Medicaid

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 (§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.

Ordering, prescribing or referring (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

Effective January 1, 2018, the OPR requirement will apply to orders, prescriptions or referrals for individuals enrolled in a Nevada Medicaid MCO.

Furthermore, if items or services are ordered, prescribed or referred by a resident or intern, the claim must identify the intern or resident's NPI as the ordering or referring practitioner. Interns and residents are allowed to enroll in the Nevada Medicaid program as an OPR provider only.

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). Any claims which do not conform to these requirements may deny, and if they pay in error, they are subject to recoupment.

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

Please see Web Announcement 1372 for further information.