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October 1<sup>st</sup>, 2019

HSN ALL-BU-4

## Reporting Requirements for Order, Referring and Prescribing (ORP)

**This Health Safety Net (HSN) billing update affects all providers who submit 837I or 837P**

Effective 10/1/19, in an effort to align ORP submissions with MassHealth, the HSN is adopting the Ordering, Referring, and Prescribing requirements - as instituted by MassHealth All-Provider Bulletin 286.

Under this bulletin, MassHealth requires that for any service that is to be ordered, referred, or prescribed; ACA Section 6401(b) requires that:

1. the billing provider include the ORP provider's NPI on the claim; and
2. the ORP provider be actively enrolled with MassHealth as a fully participating provider or as a nonbilling provider and be an authorized ORP provider, as described below.

The ORP requirements described in this bulletin apply to all claims submitted by providers for payment by the Executive Office of Health and Human Services, for services for which MassHealth or HSN require an order, referral or prescription; including claims for secondary coverage, Medicare Crossover claims, and Children's Medical Security Plan<sup>1</sup> claims. ORP requirements do not apply to claims submitted to managed care entities.

Note: There are other circumstances in which the NPI of a non-billing provider may be required to be included on claims in order to comply with HIPAA Version 5010 requirements. In such circumstances, those providers (e.g., attending, rendering, supervising, and operating providers) must also be enrolled with MassHealth at least as a non-billing provider for the claim to be payable. Non-billing providers may be independent providers as well as facility-based providers.

### HSN Services That Require an Order, Referral, or Prescription

The following services and supplies require an order, referral, or prescription from a provider for the billing provider to receive HSN payment. Please note that not all services listed below are eligible HSN reimbursement. Please refer to 101 CMR 613: Health Safety Net Eligible Services for a full listing of reimbursable services.

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<sup>1</sup> All references to MassHealth include the Children's Medical Security Plan.



## Reporting Requirements for Order, Referring and Prescribing. (ORP)

Any service that requires a Primary Care Clinician (PCC) referral	Labs and Diagnostic Tests*
Adult Day Health	Medications*
Adult Foster Care	Orthotics
Durable Medical Equipment and Supplies (DME)	Oxygen/Respiratory Equipment
Eyeglasses*	Prosthetics
Group Adult Foster Care	Psychological Testing*
Home Health	Therapy (PT, OT, ST)*
Independent Nurse	

\*HSN reimbursable services.

### Provider Types Authorized to Order, Refer, or Prescribe

The following types of providers are the only provider types that may be included on a HSN claim as the ordering, referring, or prescribing provider, and are referred to in this bulletin as “authorized ORP providers”. Interns, residents, and other trainees in the provider types listed below who are authorized to order, refer, or prescribe services are also considered authorized ORP providers. HSN providers should consult MassHealth program regulations for details on which provider types may order, refer, or prescribe services.

Certified Nurse Midwife	Pharmacist (if authorized to prescribe)
Certified Registered Nurse Anesthetist	Physician
Clinical Nurse Specialist	Physician Assistant
Dentist	Podiatrist
Licensed Independent Clinical Social Worker	Psychiatric Clinical Nurse Specialist
Certified Nurse Practitioner	Psychologist
Optometrist	

For dates of service on or after 2/15/20, claims will be denied for the following provider types (Group 2):

Abortion/Sterilization Clinic	Hospital-licensed Health Center*
Acute Inpatient Hospital*	Independent Diagnostic Testing Facility
Acute Outpatient Hospital*	Mental Health Center
Certified Independent Laboratory	Pharmacy (for claims processed through MMIS**)
Community Health Center*	Psychiatric Outpatient Hospital
Early Intervention	Renal Dialysis Center
Family Planning Agency	Substance Use Disorder Outpatient Hospital
Volume Purchaser	

\*HSN reimbursable provider types.

\*\*Note that all claims processed by the Pharmacy Online Processing System (POPS) already require that the Prescriber NPI be included on the claims and be eligible to prescribe.

For more information regarding claim denials, denial edits, and claims submission instructions related to Ordering, Referring and Prescribing requirements. Please refer to MassHealth ALL-Provider Bulletin 286 dated September 2019.