

Frequently Asked Questions about Ordering, Referring, and Prescribing (ORP) Provider Requirements (updated 3-28-24)

Definitions

Authorized ORP Provider: Providers who meet the authorized provider type criteria listed in All Provider Bulletin 286.

ORP State Law Requirement: Pursuant to state law (M.G.L. c. 112), in order to obtain and maintain state licensure, Authorized ORP Providers are required to apply to enroll in MassHealth at least as a nonbilling provider.

Questions related to Unenrolled ORP Providers

In light of the ORP State Requirement, how is it possible that some Authorized ORP Providers are licensed in MA but not enrolled?

- MassHealth is working with the licensing boards to address this issue. MassHealth is sending letters to unenrolled Authorized ORP Providers who are listed as the ORP provider on claims to MassHealth to remind them of the state requirement to apply to enroll with MassHealth. Additionally, MassHealth is informing the licensing boards of unenrolled licensed Authorized ORP Providers so that the boards can remind those providers of the ORP State Requirement. MassHealth is seeing applications from these providers in response to these letters. Note that the Massachusetts licensing boards made some accommodations during the COVID-19 public health emergency (PHE) to allow providers to work with expired licenses and to obtain a license without penalty if providers did not apply for enrollment with MassHealth. These temporary accommodations were based on needs during the PHE to assure an adequate number of providers and these accommodations are no longer in effect.
- Billing providers with concerns about unenrolled Authorized ORP Providers should reach out to MassHealth Customer Service so that MassHealth can then reach out to the unenrolled provider to encourage them to apply to enroll in MassHealth and, if needed, to the relevant licensing boards.

Often billing providers receive referrals from hospital-based Authorized ORP Providers. However, they are not actively enrolled with MassHealth because hospitals bill on their behalf. How do billing providers get these ORP providers to apply to enroll with MassHealth?

- The ORP State Law Requirement requires that all providers who are Authorized ORP Providers apply to enroll with MassHealth, which includes providers that are solely hospital-based. MassHealth is informing the licensing boards of unenrolled licensed Authorized ORP Providers, so that the boards can remind them of the requirement. MassHealth will also be sending letters to unenrolled Authorized ORP Providers who are listed as the ORP provider on claims to MassHealth to remind them of the requirement to apply to enroll with MassHealth. Practices who receive a consistent number of orders, referrals or prescriptions from unenrolled hospital-based Authorized ORP Providers should reach out to the hospital and inform the hospital that the non-enrollment of the Authorized ORP Provider who is listed on the claim will lead to a claim denial if MassHealth requires that the claimed service be ordered, referred, or prescribed. Many of these

providers may not be aware of the burden this causes to the servicing/billing providers.

- The ORP State Requirement applies to all providers who are Authorized ORP Providers, including, but not limited to, such providers who are employed only at a non-group-practice MassHealth-enrolled entity which bills MassHealth for their services (hereinafter, “entity-only providers”), such as a physician who is employed only as staff of a MassHealth-enrolled hospital or community health center. Entity-only providers are required to apply to enroll in MassHealth as a nonbilling provider.

Another source of referrals for us are physicians who are out-of-state (e.g., New Hampshire or Rhode Island), but whose patients live in Massachusetts and are MassHealth members. How do we get them to apply to enroll with MassHealth?

- The ORP State Law Requirement only applies to providers licensed in Massachusetts. However, out-of-state providers may enroll in MassHealth as non-billing providers. Providers who receive a consistent number of orders, referrals or prescriptions from unenrolled out-of-state providers should reach out to those out-of-state providers and let them know of the consequences of non-enrollment leading to payment denial. Many of these out-of-state providers may not be aware of the impact of their non-enrollment. Billing providers with concerns about unenrolled out-of-state ORP providers should reach out to MassHealth Customer Service so that MassHealth can then reach out to the unenrolled provider to encourage them to apply to enroll with MassHealth.

Does MassHealth have any plans to make Authorized ORP Providers’ enrollment anniversary dates publicly available in the Provider Online Service Center (POSC)?

- A MassHealth provider’s enrollment status is subject to change due to reasons including but not limited to retirement, death, withdrawal from the MassHealth program, and expiration or revocation of license. Some situations, including but not limited to the expiration or revocation of a provider’s license, may lead to a provider being retroactively removed from the MassHealth program. To verify ORP enrollment status based on the information MassHealth has processed as of the date of the verification, MassHealth providers should utilize the search tool provided on the POSC.

How can billing providers check to see if an Authorized ORP Provider is enrolled with MassHealth?

- MassHealth has a Provider Search tool to assist billing providers in determining whether an ORP provider is enrolled with MassHealth.
- To use the Provider Search Function, you must be logged into the POSC. The provider search option is in the left navigation list. • Results will return “PROVIDER NAME,” “ADDRESS,” “NPI,” and “ACTIVE Y,” or “No active MassHealth providers found.”
- Please note that a response of “ACTIVE Y” does not definitively confirm that the provider is eligible to be an ORP provider. For example, facilities and entities (e.g., hospitals, health centers, group practices) are not Authorized ORP Providers. Also, individual providers could be in a provider type that is not authorized to order, refer, or prescribe.
- Additionally, as noted above, a MassHealth provider’s enrollment status is subject to change due to reasons including, but not limited to, retirement, death, withdrawal from the MassHealth program, and expiration or revocation of license. Some situations, including, but not limited to, the expiration or revocation of a provider’s license, may lead to a provider being retroactively removed from the MassHealth program.

If a billing provider submits a claim for a MassHealth covered service that MassHealth requires to be ordered, referred or prescribed and the claim is denied solely due to the fact that the ORP provider who is listed on the claim is not an Authorized ORP provider and/or is not enrolled in MassHealth, can the billing provider bill a MassHealth member for the service?

- No. Providers may not charge MassHealth members for covered services. See 130 CMR 450.203. Providers should utilize the search tool provided on the POSC in order to verify ORP enrollment status based on the information MassHealth has processed as of the date of the verification. Providers should note that a MassHealth provider's enrollment status is subject to change due to reasons including but not limited to retirement, death, withdrawal from the MassHealth program, and expiration or revocation of license. Some situations, including but not limited to the expiration or revocation of a provider's license, may lead to a provider being retroactively removed from the MassHealth program.

The following question is solely in regard to MassHealth covered services that MassHealth requires to be ordered, referred or prescribed. If a billing provider utilizes the POSC search tool and the search tool indicates that the provider who ordered, referred or prescribed the service for the MassHealth member is not enrolled in MassHealth and therefore the associated claim is anticipated to be denied, can the billing provider decline to provide the service to the MassHealth member?

- Billing providers should note that, in order for a claim to be payable, the Authorized ORP Provider will need to have been enrolled with MassHealth as of the date of service. If the billing provider would, at the same time and under similar circumstances in accordance with 130 CMR 450.202, decline to provide the same service to a patient who is not a MassHealth member, the billing provider may decline to provide the service to the MassHealth member. Prior to declining to provide the service, the billing provider must inform the MassHealth member of the reason for the declination and encourage the MassHealth member to seek out a MassHealth enrolled provider for an order, referral or prescription, as applicable.

General Enrollment Questions

Where can I obtain a MassHealth Nonbilling Provider Application and Contract?

- You can obtain the application and contract from the MassHealth website at [How to Enroll to be a MassHealth ORP Provider](#); by calling MassHealth Customer Service Center at 1-800-241-2900; or via e-mail to provider@masshealthquestions.com.
- For providers wishing to become fully participating providers, please contact the MassHealth Customer Service center at 1-800-241-2900 or via e-mail at provider@masshealthquestions.com.

What is considered to be a complete enrollment application?

- MassHealth does not consider an application as completed until all requested information is provided in accordance with the application instructions. Providers who do not adhere to the requirement to submit a complete and accurate application will be reported to their respective licensing board, which may result in further action.

If a provider is working for an entity, is each individual provider required to apply to enroll?

- Yes. Authorized ORP providers are required to apply to enroll individually at least as a nonbilling provider if they are not already enrolled in MassHealth and are working for an entity. The ORP State Law Requirement applies to all providers who are Authorized ORP Providers, including, but not limited to, such providers who are employed only at a non-group-practice MassHealth-enrolled entity which bills MassHealth for their services (hereinafter, “entity-only providers”), such as a physician who is employed only as staff of a MassHealth-enrolled hospital or community health center. Entity-only providers are required to apply to enroll in MassHealth as a nonbilling provider.

If a provider works at multiple entities and is already enrolled in MassHealth, does the provider need to complete a distinct MassHealth application for each entity?

- No. If a provider is enrolled in MassHealth, additional applications do not have to be completed.

Once the nonbilling provider applications have been received and approved, will there be a notification of enrollment?

- Yes. All enrolled Authorized ORP Providers will receive a letter that includes the assigned MassHealth provider identification number. In general, the enrollment effective date will be the application processing date (similar to the process for billing provider applications).

If an entity has NPI numbers for all their providers, are the individual providers already registered with MassHealth?

- No. An NPI is a National Provider Identifier. It is a 10-digit unique number used to identify a provider in a standard way throughout the health care industry. It is not equivalent to enrollment in MassHealth.

Is the ORP enrollment requirement for getting a Massachusetts license applicable only to limited licenses, or full licenses as well?

- Pursuant to the ORP State Law Requirement, all licensed providers (both limited and full licenses) who are Authorized ORP Providers are required to apply to MassHealth as at least a nonbilling provider in order to obtain and maintain state licensure.

Is this a one-time enrollment or will providers be required to renew their enrollment periodically?

- Providers are required to revalidate their information on file with MassHealth every five years. Providers will receive notification of this process. In the interim, always remember to keep your information on file with MassHealth up to date.

Physician-Specific Enrollment Questions

As part of residents' application for a Massachusetts license, will they have to apply to enroll as nonbilling providers?

- Yes, pursuant to the ORP State Law Requirements, in order to obtain and maintain licensure, physicians, including residents and interns, have to apply to be enrolled with MassHealth at least as a nonbilling provider.

When completing the Nonbilling Provider Application for residents, should the primary service location information be left blank?

- No. The primary service location should be listed. If residents rotate to different facilities, they should list the location utilized most frequently to the best of their knowledge.

If all orders are written under an attending NPI and name, do interns, residents, and fellows still have apply to enroll as with MassHealth as nonbilling providers?

- If the orders are written under the attending NPI, then the NPI of the attending physician would be included in the claim for the ordered service and the attending physician would need to be enrolled with MassHealth for the claim to be payable. If interns, residents, or fellows prescribe a medication or order or refer a service on their own, the subsequent claim will be denied if the provider is not enrolled. Additionally, pursuant to the ORP State Law Requirement, license issuance and renewal for physician interns, residents, and fellows requires application for enrollment with MassHealth.

How is MassHealth communicating with doctors in community settings about the need to enroll with MassHealth?

- MassHealth developed a comprehensive communication plan. The first steps were to work closely with the provider associations to educate their members, as well as hosting training webinars for the providers in the associations. We then addressed larger organizations to offer assistance and training.

Community Health Center (CHC)-/Federally Qualified Health Care (FQHC)-Specific Enrollment Questions

Does the ORP State Law Requirement apply to providers who practice in a CHC or FQHC, even if claims for their services are billed by the CHC or FQHC as an entity?

- Yes. The ORP State Law Requirement applies to all providers who are Authorized ORP Providers.

Physician Assistant and Nurse Practitioner-Specific Enrollment Questions

Will physician assistants and nurse practitioners have to apply to enroll with MassHealth?

- Yes. Both provider types are Authorized ORP Providers and therefore are required by the ORP State Law Requirement to apply to enroll with MassHealth at least as nonbilling providers.

Will physician assistants and nurse practitioners also be enrolling as MassHealth nonbilling providers when they apply for their licenses?

- Yes. All providers who are Authorized ORP Providers are required to apply for enrollment with MassHealth in order to obtain and maintain state licensure. MassHealth encourages Authorized ORP Providers to enroll with MassHealth before their license renewal.

Pharmacist-Specific Enrollment Questions

Which pharmacists are Authorized ORP Providers?

- Pharmacists with prescriptive authority are considered to be Authorized ORP Providers. This includes, without limitation, pharmacists who have collaborative practice agreements and/or collaborative drug therapy-management agreements with prescriptive authority. Pharmacists may also prescribe hormonal contraceptive patches and self-administered oral hormonal contraceptives, so long as they comply with requirements set by DPH. In order for claims based on the prescription of a pharmacist to be payable, the prescribing pharmacist must be enrolled in MassHealth.
- Pharmacists who have collaborative practice agreements and/or collaborative drug therapy-management agreements with prescriptive authority must also obtain a Massachusetts Controlled Substances Registration (MCSR) from the DPH Drug Control Board if they wish to prescribe pursuant to the collaborative agreement. MassHealth is enrolling those eligible pharmacists as nonbilling providers so that claims based on their prescriptions can be payable.

What are the requirements for prescribing hormonal contraceptive patches and self-administered oral hormonal contraceptives?

- M.G.L. c. 94C, § 19F, as implemented by 105 CMR 700.004(B)(15), authorizes Massachusetts licensed pharmacists to prescribe and dispense hormonal contraceptive patches and self-administered oral hormonal contraceptives. DPH issued the following circular letter to provide additional guidance: <https://www.mass.gov/doc/contraceptive-prescribing-and-dispensing-pdf/download>

How do I know if I qualify to get a MCSR from DPH?

- There is information about Massachusetts Controlled Substances Registration at www.mass.gov/eohhs/gov/departments/dph/programs/hcq/drug-control/mcsr/.

I have a collaborative drug-therapy management agreement now but not an MCSR. Should I apply for the provider number?

- Only if you intend enroll in MassHealth as an ORP (i.e., nonbilling) provider. The only reason for the provider number is to allow MassHealth to pay for prescriptions that you write.

Will enrolled pharmacists be paid by MassHealth for writing the prescription?

- No. The reason for eligible pharmacists to enroll with MassHealth is to allow prescription claims from pharmacies to be payable.

Billing Questions

Prior to the claims denials going into effect, did the Informational Edits (i.e., “warning messages”) that showed on remittances show only on claims with providers not enrolled?

- The warning messages showed on each individual service that would deny if the claim did not meet any or all of the ORP billing requirements. Now that the edits are set to deny, the edits are no longer be informational. *All Provider Bulletin 286* has the details of the claim edit numbers and their reasons.

When did MassHealth begin to deny claims due to ORP requirements?

- See *All Provider Bulletins 361* and *376* for the dates that MassHealth began to deny claims that do not meet the ORP requirements.

Once the edits have been set to deny, will the MassHealth Customer Service Center be able to tell us if the Authorized ORP Providers are enrolled with MassHealth? Do we have any recourse for a denial? Can we resubmit the claims in MMIS?

- Yes, the Customer Service Center will be able to assist you with questions regarding claim denials, including whether a particular Authorized ORP Provider is enrolled with MassHealth. The standard claim resubmission procedures are not changing. You may resubmit the claim with the appropriate ORP NPI in accordance with the timelines and other requirements established in MassHealth regulations and guidance. However, in order for the claim to be payable, the Authorized ORP Provider will need to have been enrolled with MassHealth as of the date of service. As noted above, you should check that anyone who may order or refer to you is enrolled with MassHealth.

Where do I enter the NPI of the Authorized ORP Provider in my electronic claims submissions?

- Please see *All Provider Bulletin 286* and the “How to Populate Ordering and Referring Provider Info” posted on the MassHealth ORP webpage for instructions on where the NPI should be listed on claims.

Is the NPI of the Authorized ORP Provider required on the claim level or on the service line level of the EDI file?

- For claims that include one or more services that require an ordering provider, the NPI should be populated in the service line level
- For claims that include one or more services that require a referring provider, the NPI should be populated in the claim level

In which loop and segment should the NPI of the Authorized ORP Provider be submitted in the 837P and/or 837I 5010 file?

- In an 837 professional claim
 - 2310A NM1*DK – referring provider
 - 2420E NM1*DN – ordering provider
- In an 837 institutional claim
 - 2310F*DN referring provider

Where should the Authorized ORP Provider’s NPI be reported in electronic claim files?

- Professional claims that require a PCC referral or include laboratory or diagnostic testing services should include the ORP provider’s NPI in Loop 2310A. All other impacted Professional claim services should include the ORP provider’s NPI in Loop 2420E.
- Institutional claims for all impacted services should include the ORP provider’s NPI in Loop 2310F.

What will happen if we include a Authorized ORP Provider on a claim as the ORP provider when it is not required to list the ordering, referring or prescribing provider?

- If an NPI is included in an ordering or referring field when not required, the claim may not be payable as MassHealth may still edit the claim to see if the NPI is for an Authorized ORP Provider and to see if the Authorized ORP Provider is enrolled with MassHealth. If the claim is otherwise payable, it would not be denied solely for unnecessarily including the NPI of an Authorized ORP Provider who is enrolled with MassHealth.