

Frequently Asked Questions about Ordering, Referring, and Prescribing (ORP) Provider Requirements (updated July 23, 2025)

Ordering, Referring, and Prescribing Requirements

Section 6401(b) of the Affordable Care Act includes requirements related to ordering, referring, and prescribing (ORP) providers. If MassHealth requires a service to be ordered, referred, or prescribed, then ACA Section 6401(b) requires that:

1. the billing provider include the ORP provider's national provider identifier (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.

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. Details on ORP provider requirements can be found at [ACA Section 6401—Ordering, Referring, and Prescribing Provider Requirements](#).

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 Massachusetts but not enrolled?

- MassHealth works with the licensing boards to address this issue. We send letters to unenrolled Authorized ORP Providers who are listed as the ORP provider on claims to MassHealth. These letters remind providers of the state requirement to apply to enroll with MassHealth. Additionally, MassHealth informs the licensing boards of unenrolled licensed Authorized ORP Providers so that the boards can remind those providers of the ORP State Law Requirement. MassHealth has received 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were based on needs during the PHE to assure an adequate number of providers, and these accommodations are no longer in effect.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. MassHealth will then reach out to the unenrolled provider to encourage them to apply to enroll in MassHealth and, if needed, to the relevant licensing boards.

Billing providers often receive referrals from hospital-based Authorized ORP Providers. However, these authorized ORP providers 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. This includes providers who are solely hospital-based. MassHealth informs the licensing boards of unenrolled licensed Authorized ORP Providers, so that the boards can remind those providers of the requirement. MassHealth will also send 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 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 that bills MassHealth for its services (hereinafter, “entity-only Authorized ORP providers”), such as a physician who is employed only as staff of a MassHealth-enrolled hospital or community health center. Entity-only Authorized ORP providers are required to apply to enroll in MassHealth as a nonbilling provider.

Another source of referrals are out-of-state physicians (from surrounding states like Connecticut, New Hampshire, or Rhode Island) 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. Billing 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 that their not enrolling in MassHealth may lead to payment denial for the billing provider. 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. MassHealth can then reach out to the unenrolled provider to encourage them to apply to enroll with MassHealth.

Can billing providers use any tools to verify the MassHealth enrollment dates of Authorized ORP Providers?

- 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 (hereinafter, “MassHealth Processed Enrollment Information”), MassHealth providers should use the MassHealth [Provider Self-Service](#) process described just below.

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

- Billing providers may utilize the MassHealth [Provider Self-Service](#) to determine whether an ORP provider is actively enrolled with MassHealth. The steps to do so are as follows:
 - Choose the first option on the homepage “Check Provider Enrollment Status” and search for the ORP provider using their MassHealth Provider ID / Service Location (PID/SL) or National Provider Identification (NPI).

- If, based on MassHealth Processed Enrollment Information, the ORP provider is actively enrolled, the results will display the effective date of their MassHealth enrollment, and if they are not currently actively enrolled it will display “Not Currently Enrolled.”
- 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 must be ordered, referred, or prescribed and the claim is denied solely because the ORP provider 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 use [MassHealth Provider Self-Service](#) 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 must be ordered, referred, or prescribed. If a billing provider uses [MassHealth Provider Self-Service](#) and MassHealth Provider Self-Service indicates that the provider who ordered, referred, or prescribed the service for the MassHealth member is not actively 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 actively 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. Before declining to provide the service, the billing provider must tell the MassHealth member why the service has been declined and encourage them to seek out a MassHealth-enrolled provider for an order, referral, or prescription, as applicable.

General Enrollment Questions

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

- The combined application and contract is available on the [MassHealth ORP web page](#). You can also email provider@masshealthquestions.com or call MassHealth Customer Service at (800) 241-2900 to request one.
- Providers who want to become fully participating providers can visit the [Apply to become a MassHealth Provider](#) page or contact MassHealth Customer Service at provider@masshealthquestions.com or (800) 241-2900.

What is considered a complete enrollment application?

- MassHealth does not consider an application complete until all requested information has been provided in accordance with the application instructions. Providers who do not meet 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 Authorized ORP providers”), such as a physician who is employed only as staff of a MassHealth-enrolled hospital or community health center. Entity-only Authorized ORP providers, including but not limited to interns, residents, and other trainees, are required to apply to enroll in MassHealth as nonbilling providers.

If an individual 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 an individual provider who is an Authorized ORP provider is enrolled in MassHealth, then that individual provider does not have to complete additional applications for this purpose.

Once the nonbilling provider application has been received and approved, will the provider receive a notification of enrollment?

- Yes. All enrolled Authorized ORP Providers will receive a letter that includes the assigned MassHealth provider identification number to the Primary Service Location or home address listed on their application. 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. This 10-digit unique number is used to identify a provider in a standard way throughout the health care industry. It is not equivalent to enrollment in MassHealth. Individuals and entities must each have their own NPI.

What do I do if I do not have a National Provider Identifier (NPI)?

- If you do not have an NPI, you must apply at [CMS.gov](https://www.cms.gov) and receive your NPI before submitting your MassHealth application.

Does the ORP enrollment requirement for getting a Massachusetts license apply only to limited licenses or also to full licenses?

- Under the ORP State Law Requirement, all licensed providers (with both limited and full licenses) who are Authorized ORP Providers are required to apply to MassHealth as at least a nonbilling provider 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, under the ORP State Law Requirements, physicians, including residents and interns, must apply to be enrolled with MassHealth at least as a nonbilling provider to obtain and maintain licensure.

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 where they work 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 to 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, under the ORP State Law Requirement, license issuance and renewal for physician interns, residents, and fellows requires MassHealth enrollment.

How does MassHealth communicate with doctors in community settings about the need to enroll with MassHealth?

- We have a comprehensive communication plan. We worked 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- and Federally Qualified Health Care-Specific Enrollment Questions

Does the ORP State Law Requirement apply to providers who practice in a Community Health Center (CHC) or Federally Qualified Health Care center (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

Do 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.

Do physician assistants and nurse practitioners also have to enroll 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 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 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, as long as they comply with requirements set by the Department of Public Health (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 under the collaborative agreement. MassHealth enrolls 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 [Circular Letter: DCP 23-10-121](#) to provide additional guidance.

How do I know if I qualify to get a Massachusetts Controlled Substances Registration?

- Visit the [Massachusetts Controlled Substances Registration \(MCSR\) page](#) on mass.gov.

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

- Only if you intend to 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 a prescription?

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

Billing Questions

Can an MMIS claim that was initially suspended because the ORP provider was unenrolled become payable once the ORP provider is enrolled?

- Yes, as described in [All Provider Bulletin 391](#).

A pharmacy claim that is processed through the Pharmacy Online Processing System (POPS) has been denied because the prescriber is not enrolled. Is an override available?

- Yes, as described in [All Provider Bulletin 391](#).

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 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?

- [All Provider Bulletins 361 and 376](#) include the dates that MassHealth began to deny claims that do not meet the ORP requirements.

Once the edits have been set to deny, will MassHealth Customer Service 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, MassHealth Customer Service 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 have not changed. 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, for the claim to be payable, the Authorized ORP Provider must be 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.

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 Primary Care Clinician (PCC)/Primary Care Accountable Care Organization (PCACO) 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.
- 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.

Which NPI do I enter for claims that require PCC/PCACO referrals?

- For claims for services referred by an individual PCC, enter the Referring Provider Name and NPI.
- For claims for services referred by an entity PCC, enter the Individual Referring Provider Name and NPI.
- Please see the [Inquire on a Referral Job Aid](#) for information on how to find the Referring Provider and Individual Referring Provider information.

What will happen if an Authorized ORP Provider is included on a claim as the ORP provider when 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.