

# Frequently Asked Questions about Ordering, Referring, and Prescribing Provider Requirements (updated 3/22/23)

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## 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](mailto: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](mailto:provider@masshealthquestions.com).

### ***How will I know if the ORP provider is enrolled with MassHealth?***

- MassHealth has developed a searchable database which will indicate whether a provider is actively enrolled with MassHealth. 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 “Electronic Health Records (EHR) Incentive Program only” or could be in a provider type that is not authorized to order, refer or prescribe.
- Billing providers should refer to edits on their claim remittance advices, including the POSC version of the MassHealth and HSN PDF remittance advice and the 835 Electronic Remittance Advice HIPAA file (RAs). The RAs identify claims with ORP denial edits for providers not enrolled in MassHealth.
- We suggest that billing providers keep their own working list of those providers with whom they work most often and verify their MassHealth enrollment status directly with them.

### ***Do I have to enroll as an ORP provider if I am already a MassHealth provider?***

No. No action is needed if you are enrolled with MassHealth and have an active assigned MassHealth Provider Identification Number. However, if you are enrolled in the MassHealth system for the purposes of the MassHealth Electronic Health Record (EHR) Incentive Program only, you will have to fill out a nonbilling provider application so that claims based on your orders, referrals, or prescriptions will be payable and so that you can maintain your state license.

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

Yes. Authorized ORP providers will have 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.

### ***If a specialist works at multiple entities and is already enrolled in MassHealth, does the specialist need to be linked to each entity for which he or she works for the purposes of ORP?***

No. If a provider is enrolled in MassHealth, additional nonbilling applications do not have to be completed. Unrelated to the ORP requirement, a provider will need to be linked to an entity for MassHealth billing purposes if the entity is a group practice.

***Once ORP applications have been received and approved, will there be a notification of enrollment?***

Yes. All enrolled 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 fully participating providers).

***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 industry. It is not equivalent to enrollment in MassHealth.

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

All providers licensed (both limited and full licenses) in the authorized ORP provider types will be 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?***

Nonbilling providers will be 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 as nonbilling providers?***

Yes. State law requires that, in order to obtain or maintain licensure, physicians, including residents and interns, will 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 to enroll as with MassHealth as ORP 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, 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 has 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- /Federally Qualified Health Care (FQHC)-Specific Enrollment Questions**

***Will a provider practicing in a community health center (CHC) have to enroll as an ORP provider even if claims are billed under the CHC's NPI?***

Yes. If the CHC's rendering providers fall under the provider type identified as an authorized ORP provider, they will need to comply. You may not list an entity as an ORP provider on a claim and the POSC PCC referral panel requires entity PCC's to select an individual provider as the referring provider.

***Is the ORP requirement the same for FQHC organizations?***

Yes.

**Physician Assistant and Nurse Practitioner-Specific Enrollment Questions**

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

Yes. Both provider types are on the list of authorized ORP providers and therefore have 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 of the authorized ORP provider types are required to apply for enrollment with MassHealth in order to obtain or maintain state licensure. We encourage authorized ORP providers to enroll with MassHealth before their license renewal.

**Social Worker-Specific Enrollment Questions**

***If social workers are required to register as ORP providers, can they also enroll as fully participating MassHealth providers? We have been told that LICSWs can be credentialed into MassHealth only as qualified Medicare beneficiary (QMB) providers.***

Effective January 1, 2023 LICSWs are now eligible to be fully participating providers with MassHealth. LICSWs may choose to enroll with MassHealth as a fully participating provider, as a QMB only provider (receiving payment only for Medicare crossover claims) or as an ORP nonbilling provider.

**Hospital-Specific Enrollment Questions**

***If an independent provider refers a patient to our hospital and the provider is not enrolled with MassHealth, will the services provided here as a result of the referral be denied?***

Effective for dates of service on or after September 1, 2023, if the service provided by the hospital is a service that requires an order or referral and the ORP provider is not enrolled with MassHealth at least as a nonbilling provider, then the hospital's claim will deny.

***If we have trainees (i.e., interns, residents, and fellows) that provide services at two different hospitals, do they have to submit multiple applications for each place of service?***

No. Only one nonbilling application is needed for each authorized ORP provider.

## **Meaningful Use- /Electronic Health Record-Specific Enrollment Questions**

***If a provider has been enrolled for meaningful use for electronic health record (EHR) incentive payments only and has a MassHealth provider identification number, will the provider still have to apply to be enrolled as ordering and referring?***

Yes. Such providers will still have to submit a nonbilling application and contract so that MassHealth can collect additional information needed to comply with this ACA requirement.

## **Pharmacist-Specific Enrollment Questions**

***Do all registered pharmacists have to enroll as providers with MassHealth?***

The only pharmacists that are considered to be authorized ORPs are those who have collaborative drug therapy-management agreements with prescriptive authority and a Massachusetts Controlled Substances Registration (MCSR) from the DPH Drug Control Board. MassHealth is enrolling those eligible pharmacists as nonbilling providers so that claims based on their prescriptions can be payable.

***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/](http://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?***

No. Applications for MassHealth provider numbers will only be accepted from pharmacists with an MCSR. The only reason for the provider number is to allow MassHealth to pay for prescriptions that you write.

***Will enrolled pharmacists be paid 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, do the Informational Edits (warning messages) that show on remittances show only on claims with providers not enrolled?***

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

***What is the date on which MassHealth plans to start denying claims?***

- See *All Provider Bulletin 361* for the staggered timeline to begin 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 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 any questions about a claim denial, including whether a particular 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. As noted above, you should make certain that anyone who may order or refer to you is enrolled with MassHealth.

***Where do I enter the NPI of the ORP provider in my electronic claims submissions?***

Please see *All Provider Bulletin 286* for instructions on where the NPI should be listed on claims.

***Is the NPI of the 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 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 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 an ORP provider on a claim when it is not required?***

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 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 enrolled with MassHealth.