



PHARMACY FACTS

*Current information for pharmacists about
the MassHealth Pharmacy Program*

www.mass.gov/masshealth-pharmacy-facts

Editor: Vic Vangel Contributors: Jennifer Banks, Ryan Bettencourt, Aimee Evers, Neha Kashalikar, Kim Lenz, Mackenzie McVeigh, Natalie Rodenberg, Nancy Schiff

Summary of MassHealth All Provider Bulletin 380 – Updates to the Implementation of Prescriber Requirements for Pharmacies

Delayed Start Date for Enforcing Prescriber Requirements for Pharmacies

All Provider Bulletins (APB) [361](#) and [376](#) announced the start dates for enforcing the ordering, referring, and prescribing (ORP) requirements, including those for pharmacy claims.

Due to necessary system updates, the start date to enforce the requirement that claims processed by the Pharmacy Online Processing System (POPS) must include a prescriber who is actively enrolled with MassHealth will be delayed. This requirement will begin to be enforced for dates of service on or after May 1, 2024.

Pharmacies should continue to review informational messages related to this requirement to avoid ORP-related denials when the enforcement takes effect.

ORP requirements arise under federal law, Section 6401(b) of the Affordable Care Act (ACA). If MassHealth requires a service to be ordered, referred, or prescribed, then ACA Section 6401(b) requires the ORP provider to be enrolled with MassHealth as a fully participating provider or as a nonbilling provider; to be an authorized ORP provider type as described on page 2 of [APB 286](#); and to have their National Provider Identifier (NPI) on the claim. This means that (1) a prescriber of a drug or of medical equipment/supplies for a MassHealth fee-for-service, Primary Care Accountable Care Organization, or Primary Care Clinician Plan member, will be required to be enrolled as a MassHealth provider, and (2) the pharmacy provider must include the prescriber's NPI on the claim.

Pharmacists eligible to prescribe are subject to the same ORP requirements for MassHealth claims. Pharmacists who are eligible to prescribe can participate in MassHealth only as nonbilling providers, and should visit the [MassHealth website](#) for more information on enrolling, or contact MassHealth Customer Service at (800) 841-2900, TDD/TTY: 711. Pharmacists must possess a valid NPI to enroll.