

## ORP Frequently Asked Questions (FAQs)

### 1. Why is Kentucky Medicaid requiring Ordering, Referring, and Prescribing Providers (ORP Providers) to enroll as Kentucky Medicaid providers?

This is being done in order to comply with program integrity provisions of the Affordable Care Act (ACA), specifically section 6401 which is found in the Code of Federal Regulations: 42 CFR § 455.410(b): "The State Medicaid agency must require all ordering or referring physicians or other professionals providing services under the State plan or under a waiver of the plan in the fee-for-service program to be enrolled as participating Medicaid providers." As a result, ORP providers will undergo a screening process to improve program integrity and reduce fraud, waste and abuse. This screening process includes a review of federal exclusion lists and other databases that would prohibit an excluded healthcare professional from being associated with Medicare or Medicaid.

### 2. What are the requirements for ORP?

There are three basic requirements:

- The physician or non-physician practitioner who wrote the order, referral or prescription must be enrolled as a Kentucky Medicaid billing provider and their NPI and NAME must be included on claims submitted to the department.
- The provider's NPI must be for an individual physician or non-physician practitioner (not an organizational NPI).
- The physician or non-physician practitioner must be of a specialty type that is eligible to order, refer, or prescribe.

### 3. Does the Kentucky Department of Medicaid have a list of provider types that are eligible to be ORP providers?

Currently, the list of eligible OPR Providers includes:

- Licensed Doctors of Medicine/Osteopathy
- Licensed Doctors of Dental Medicine/Surgery
- Licensed Doctors of Podiatric Medicine
- Licensed Doctors of Optometry
- Licensed Physician Assistants
- Licensed Nurse Practitioners (APRN)
- Licensed Clinical Nurse Anesthetists (CRNA)
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*Note: Organizational providers are prohibited from ordering, referring, or prescribing medications.*

**4. I am currently enrolled as an active provider with Kentucky Medicaid. Do I need to enroll as an ORP provider?**

No. Providers already enrolled as active Medicaid billing providers do not need to enroll again as an ORP provider.

**5. Will I need to obtain a National Provider Identifier (NPI)?**

Yes. As providers of health care services, ORP providers are required to obtain and share their NPI with payers. If an ORP provider does not already have an NPI, they can obtain one from the following website: <https://npiregistry.cms.hhs.gov/NPESRegistry/NPIRegistryHome.do>

**6. What if the provider is enrolled with another state's Medicaid program? Will the provider need to enroll in all states in which he or she provides service?**

Yes. Enrollment in another state's Medicaid program does not exempt an ORP provider from the requirement to enroll with Kentucky Medicaid. It is not uncommon for providers from other states to write orders and prescriptions for Kentucky Medicaid recipients. The requirement for ORP providers to enroll in Medicaid programs is found in 42 CFR 455.410 and Section 1866(j) of the Social Security Act.

**7. How does the Medicaid provider who is rendering the service know the NPI of the ORP providers? Once the provider knows the NPI of the ORP provider, how can they tell if the ORP provider is enrolled in the Kentucky Medicaid program?**

It is ultimately the responsibility of the Medicaid billing provider to obtain the NPI of the ORP provider and to confirm that the ORP provider is enrolled in Kentucky Medicaid. Each provider must develop its own internal processes to ensure the enrollment requirement is met.

**8. Do claims submitted to Kentucky Medicaid Managed Care Organizations have to follow the ORP requirement?**

Yes, Medicaid Managed Care Organizations are participants with this regulation.

**9. If the provider NPI and name shown on the claim is not a provider enrolled in Kentucky Medicaid, when will claim denials begin?**

Since the enrollment of ORP providers is a new requirement, there will be a phase-in period. Claims will not be denied for ORP requirements until July 1, 2017. During this phase-in period, billing providers will receive a notification on their Remittance Advice every time a claim is submitted and the ORP provider is not enrolled with Kentucky Medicaid.

**10. Upon enrollment, am I required to list each location where I perform ORP services?**

Yes.

**11. If Kentucky Medicaid is a secondary or tertiary payer to commercial insurance, will the claim be accepted without the NPI and NAME of the enrolled ordering, referring, or prescribing provider?** No. The ORP requirement also applies if Medicaid is being billed as secondary/tertiary to commercial insurance.

**12. Are Medicare crossover claims subject to the ORP requirement?**

Yes. Medicare crossover claims are also subject to the ORP requirement.

**13. If a Kentucky Medicaid enrollee is out-of-state and receives services in an emergency room or hospital, can the hospital services or prescriptions or orders written by the out-of-state provider be reimbursed by Kentucky Medicaid?**

Claims for hospital services must contain the NPI and NAME of the attending provider and the attending provider must be enrolled in the Kentucky Medicaid program for the hospital services to be reimbursed by the department. Likewise, the claim for the prescription or ordered item must contain the NPI and the NAME of the ordering or prescribing provider, and the ordering or prescribing provider must be enrolled in the Medicaid program in order for the prescription or order to be reimbursed by the department. .

**14. Who should I contact if I have questions regarding enrollment in the Kentucky Medicaid program?**

Contact the Kentucky Medicaid Provider Enrollment at 1-800-(877) 838-5085 Monday to Friday 8 a.m. - 4:30 p.m. ET.