



Prescribing Practitioner Enrollment Requirement

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Agenda

- Overview of federal Ordering, Referring & Prescribing (ORP) provider enrollment policy.
- Implementation timeline and impact.
- Medicaid's outreach strategy to mitigate impacts.
- What can you do to help/resources

ORP Overview

- In 2011, as part of the ACA, CMS introduced Federal Medicaid regulations requiring enrollment of Ordering, Referring & Prescribing (ORP) practitioners. (42 CFR § 455.410)
- Maryland has implemented most ACA provider enrollment requirements to date:
 - Site visits
 - Revalidation and screening
 - Rendering, attending and referring

Final Requirement - Prescriber Edits

- To comply, Medicaid must deny any pharmacy claim where prescriber is not actively enrolled.
- This edit, more than others, has a direct impact to patient health and safety as the denial occurs at the point-of-sale (POS).
 - Previous edits result in payment denial on back end.
- Applies to Fee-For-Service (FFS) claims only.

Policy Implementation Phases

- **Current State: Soft Edits** for all medications (since November 2022)
- **Phase 1 Denials: (January 2024)** Medicaid will deny pharmacy claims for non-behavioral health drug classes if the prescriber is not enrolled.
- **Phase 2 Denials: (July 2024)** Medicaid will deny ALL pharmacy claims regardless of drug class if the prescriber is not enrolled.

Phase 1 Prescriber Data - Non-BH

- 1,870 unenrolled practitioners prescribed non-behavioral health class drugs.
- ~1,000 practitioners located in Maryland.
- Prescribers should apply by December 1 in order to make sure they are active prior to the January go live.

Prescriber Enrollment Options

An individual practitioner may enroll as either:

- 1) A fully participating (billing or rendering) provider;
or
- 2) An ORP-only Provider - **Does not bill for services
or sign a full Provider Agreement.**

Objective and Strategy

- Medicaid's goal is enrollment of prescribers, not claim denials.
- Failing to enroll jeopardizes patient access to Medicaid covered prescriptions.
- Medicaid needs the support of all provider groups, facilities and stakeholders to encourage enrollment
- Many years of outreach and predecessor steps to enroll as many practitioners as possible.

Current Outreach Efforts

- Direct mail to 1,870 prescribers using federal NPI registry contact information.
- Partner with provider organizations (e.g., MedChi, MHA).
- Work with hospitals to enroll any prescribing practitioners, including students/trainees.
- Pharmacy messaging on claims from unenrolled prescribers starting in Nov 2022.

Internal Preparation for Go-live

- Medicaid is preparing to handle an influx of provider applications and requests for support.
- Developing scripts and policy briefings for any hotline or call center that may receive calls from providers or participants.
- Developing patient communications strategy to inform them of the changes.

What can you do? Verify Enrollment.

- Check practitioner enrollment status with the [Provider Verification System](#) (PVS).
- Notify any unenrolled prescribing practitioner in your organization they must enroll. **Some practitioners may not know their status.**
- PVS access and instructions:
<https://health.maryland.gov/mmcp/provider/Pages/pvs.aspx>

What can you do? Educate Prescribers.

- **“Why should I enroll with Medicaid?”**
 - Medicaid enrollment protects your patients.
 - Failure to enroll may require your Medicaid-eligible patients to seek care from a different practitioner.
 - ORP-only enrollment is an option if you don't bill Medicaid; enables self-pay arrangements with Medicaid participants.

What can you do? ENROLL!

- If you have any patients that report their pharmacy alerted them to the soft edit message, tell them how important it is for their prescriber to enroll or to transfer the prescription to an enrolled prescribers.
- Prescribers must enroll via [ePREP](#).
- Contact the ePREP hotline for help with applications: 1-844-463-7768.

Next Step - Phase 2 Behavioral Health

- Up next - outreach efforts to BH stakeholders, providers and professional groups (e.g., Maryland Psychiatric Society, OMHC rendering provider enrollment).

Provider Resources

ORP practitioner policy information:

<https://health.maryland.gov/mmcp/provider/Pages/opr>

Enrollment guidance and training:

<https://health.maryland.gov/mmcp/provider/Pages/eprepresources.aspx>

Provider Verification System (PVS):

<https://encrypt.emdhealthchoice.org/searchableProv/main.action>

Send ORP enrollment policy questions to

mdh.rxenroll@maryland.gov.

