



DEPARTMENT OF HEALTH

Wes Moore, Governor · Aruna Miller, Lt. Governor · Laura Herrera Scott, M.D., M.P.H., Secretary

October 10, 2023

Dear Provider:

You are receiving this letter because our records indicate that you recently prescribed medication to at least one Maryland Medicaid participant. According to Federal Regulations, prescribing practitioners must be actively enrolled with the Maryland Medicaid Program in order for the program to reimburse the claims for prescribed medications. **Maryland Medicaid will deny claims for medications where the prescriber is not actively enrolled by December 1, 2023, either as a fully participating Medicaid provider or an Ordering, Referring, and Prescribing (ORP) Provider.**

Your enrollment in the Medicaid Program is essential for patients to continue receiving prescriptions without disruption. Failure to enroll in the Medicaid Program while rendering care to Medicaid participants harms patients who cannot access the medications and services they need. If you do not wish to enroll with Maryland Medicaid, we request that you transition any of your Medicaid-covered patients to the care of participating Medicaid Providers to ensure continuity of care.

ORP Provider Enrollment Rules

An individual practitioner may enroll as a fully participating (billing or rendering) provider, or as an ORP-only Provider. A practitioner may not be enrolled with Medicaid as a fully participating provider and an ORP-only provider simultaneously under their National Provider Identifier (NPI).

Enrolling as an ORP-only Provider differs from full Medicaid enrollment in the following ways:

- ORP-only Providers do not sign a Maryland Medicaid Provider Agreement;
- ORP-only Providers may not submit claims to nor receive payment from Maryland Medicaid;
- ORP-only Providers may not appear on a claim as a rendering provider for professional services billable to Maryland Medicaid.

How to enroll as an ORP-Only Provider

Individual practitioners can enroll as ORP-only Providers by submitting an application using the electronic Provider Revalidation and Enrollment Portal. Providers can select "I'm an Ordering/Referring/Prescribing (ORP) provider" when starting an application. Per Federal requirements, ORP-only Providers must maintain their enrollment accounts in ePREP, including any license updates, revalidate their enrollment in ePREP every five years, and will be screened against state and federal databases.

Individual practitioners should submit their applications as fully participating or ORP-only providers at [ePREP Portal](#).

All medical students and trainees who are not fully licensed, and prescribe medications to Maryland Medicaid participants, must enroll as ORP-only Providers.

Federal Rule

Section 6401 of the Affordable Care Act and Code of Federal Regulations section 42 CFR § 455.410(b) require that ordering, referring, and prescribing practitioners be enrolled with the state Medicaid Program in order for Medicaid to pay for the ordered, referred, and prescribed services. The state Medicaid Program is prohibited from paying any claims for ordered, referred, or prescribed services by unenrolled practitioners. Pharmacy claims for prescription drugs that include an unenrolled prescriber must be denied at the pharmacy point of sale.

Recommended Resources

For prescribing practitioner policies and information, visit <https://health.maryland.gov/mmcp/provider/Pages/opr.aspx>.

For enrollment training and educational resources, visit <https://health.maryland.gov/mmcp/provider/Pages/epreresources.aspx>.

Please direct any questions about ORP enrollment policy to mdh.rxenroll@maryland.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "L. Herrera Scott".

Laura Herrera Scott, MD, MPH
Secretary of Health