



The Federal Ordering, Referring and Prescribing Requirement

***Preserving Patient Safety and
Access Through Compliance***

Presenter

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Brief Overview

- The Affordable Care Act requires providers that order, refer, or prescribe medications, testing or services to enroll in the PA Medical Assistance program.
- This includes providers such as physicians, psychiatrists, physician assistants, psychologist and certified registered nurse practitioners.
- This requirement is sometimes referred to as ordering, referring and prescribing (ORP)

Who is required by the ORP to enroll in PA Medical Assistance?

- The following licensed individuals who order, refer or prescribe in the PA Medicaid Program must enroll in the PA Medical Assistance program.
 - Psychologists
 - Physicians (including Psychiatrists)
 - Certified Registered Nurse Practitioners
 - Nurse Midwives
 - Physician Assistants

To assure Patient Access:

- Any licensed Psychologist, Physician, Physician Assistant, Certified Registered Nurse Practitioner should enroll in PA Medical Assistance.



Where are these licensed individuals working in the Behavioral Health System?

- As facility Medical Directors
- Prescribing Medications
- Prescribing Family Based, RTF and BHR
- Referring for Certified Peer and Psych Rehab services

Substance Abuse Facility Medical Directors

- The medical director of any PA State Licensed Substance Abuse Treatment Facility must be enrolled in PA Medical Assistance for the facility to bill for services.
 - This is in addition to the Facility enrollment in PA Medical Assistance
 - This includes all D&A outpatients, Methadone, Partial Hospitalization, and Residential (rehab, detox, halfway) Treatment facilities.

Mental Health Facility Medical Directors

- The medical director of any PA State Licensed Mental Health Treatment Facility must be enrolled in PA Medical Assistance for the facility to bill for services.
 - This is in addition to the Facility enrollment in PA Medical Assistance
 - This includes all Psychiatric outpatients, partial Hospitalization, Residential Treatment Facility, and Family Based programs.

Prescriptions for Medications

- The licensed individual prescribing ANY medication must be enrolled as a provider in PA Medical Assistance

“Prescriptions for BHR, RTF, CRR HH or Family Based Services”

- The Psychologist or Physician “prescribing” a BHR, RTF, CRR HH, or Family Based service must be enrolled in PA Medical Assistance.
 - This includes TSS, MT, BSC, all BHRS exceptions such as (school based, etc.), CRR Host Home and any service covered under BHR and Family Based Services.
 - In the event the prescription is filled by an outpatient clinic with a BHRS approval, both the Medical Director and the Prescriber must be enrolled!

LCSWs, LSWs, LPCs and LMFTs are not required to enroll in the PA Medicaid Program specifically for the ORP.

- The Behavioral Health Choices Medicaid Program does not permit Licensed Clinical Social Workers (LCSWs), Licensed Social Workers (LSW), Licensed Professional Counselors (LPCs), and Licensed Marriage and Family Therapists (LMFT) to serve in the following roles that require ORP documentation.
 - Facility Medical Director
 - Prescribing Medication
 - Prescribing Family Based, RTF and BHR
 - Referring for Certified Peer and Psych Rehab services

Special Consideration CRNPs

- CRNPs who are practicing in a Psychiatric facility under an MD, and who do not have the Mental Health Certification(s) necessary to enroll in PA Medical Assistance as a provider specialty 103 (Family and Adult Psychiatric Mental Health) or other Mental Health Provider Specialty, should enroll in PA Medical Assistance under a specialty consistent with the Scope of Practice permitted by their License and certification(s).

Medicare

- Medicare was scheduled to implement the ORP on February 22nd, 2017.
 - It is strongly recommended that those licensed individuals serving Medicare consumers enroll directly in Medicare to assure compliance and patient access.

Timeline Health Choices

- I strongly recommend all licensed professionals should by this presentation in August of 2017 already meet the enrollment requirements under the ORP.
 - Those that do not meet this requirement, should work to enroll licensed individuals ASAP.
- **Medications and Services not meeting the ORP requirements by the Federal Requirement date of January 1st, 2018 will not be paid!**

Collecting NPI Numbers

- To support billing, Facilities should update their paper and/or electronic claims process to collect, store and submit the NPI number of the following licensed individuals:
 - The facility Medical Director
 - The MD or Psychologist Prescribing BHRS, RTF, CRR HH or Family Based Services
 - The Psychologist or MD referring for Psych Rehab or Certified Peer Services

Collecting NPI numbers

- It is recommended that any prescription for any service or any “referral” for Psych Rehab or Certified Peer, be updated to include the NPI number.

Monitoring Licensed Individuals

- Prescriber enrollment is essential to patient access to medication, services prescribed or referred and the provider's ability to bill for services.
 - I recommend providers review all prescribers that you either employ, contract or are filling a prescription for, against the MA exclusion list at least monthly!
 - I recommend the PA Medical Assistance enrollment of key if not all prescribing and referring licensed individuals should also be checked monthly

Submitting NPI numbers

- Eventually NPI numbers must be on all PA Medical Assistance claims which require ORP documentation.
 - PA Medical Assistance currently has claims formats and requirements for MA FFS
 - PA Medical Assistance is in the process of updating claims formats for the Paper 1500 or the Electronic 837 Claim for the PA Health Choices Program

PA Health Choices Claims

- All providers are strongly encouraged to watch for the final Health Choices claims format.
- Once received providers are encouraged to move as quickly as possible to update the Electronic system that generates an 837 claim going to the MCO.

LOCUMs and Telemedicine

- Providers with contracts using Locums Tenens or PA Health Choices providers using Telemedicine providers should alert the service ASAP that any individual presented will need to enroll in PA Medical Assistance.
 - In the event they do not enroll in advance, a they must be enrolled before any prescription for medication is written or prescription or referral for services is made.
 - If they are not enrolled and the “edits” for the respective Medical Assistance Program (MA FFS or MA HC) have been turned on, the prescription or referral will not be able to be filled.

Dave's Recommendations For Health Choices Members Currently In Services

- Any current Health Choices prescription or referral that will go beyond 1/1/18 will need to be under a MA enrolled compliant Prescriber or Referrer.
- As new prescriptions and referrals come in, Providers are encouraged to seek NPI numbers and ensure enrollment immediately.
- If a Prescriber is not enrolled it is recommended that providers accept the referral and work to encourage enrollment.
- If the prescriber indicated they will not enroll or no longer can enroll, future referrals may need to be re-considered and a new prescription will be needed for services to continue beyond 1/1/2018.
- To avoid interruptions in services, reviews of the above should begin as soon as possible.



Dave's Recommendations, Cont: Health Choices Prescriptions and Referrals from an Un-enrolled Licensed Individual

- Effective ASAP, all MDs, CRNPs, PAs and Psychologists should be encouraged to enroll in PA Medical Assistance
- Prescriptions and Referrals at this time should not be rejected, to allow individuals to enroll
- Providers with services requiring a prescription or referral, should develop patient safety protocols to address referrals after January 1, 2018 from a non-enrolled licensed individual.

Third Party Coverage/Cost Sharing

- Providers often treat an individual covered by a third party, such as blue cross/blue shield.
 - For PA Health Choices, even Co-Pays cannot be paid after January 1, 2018, unless the Prescribing or Referring Licensed Professional is enrolled in PA Medical Assistance.
 - Families should be made aware of this requirement and all efforts should be made to get the prescriber enrolled or help the family to find a enrolled prescriber, while working to assure quick and prompt access to services

Medication Safety

- The primary goal is to ensure that all prescribers of medication are enrolled
- If a prescriber is not enrolled, providers should work with patients on a plan to access medication.
 - Overall I recommend providers empower consumers to fight for their own medication access while working with the pharmacy and the pharmacy plan on access.
 - Ultimately we should all be working to avoid consumers going any amount of time without access to prescribed medications.

Summary

- The final implementation of the ORP for Health Choices is approaching very quickly.
- To preserve patient safety and access any MD, CRNP, PA or Psychologist should be enrolled in PA Medical Assistance program ASAP.

