



Prescribing Practitioner Enrollment Update

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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

Policy Requirement - Claim 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

- **Phase 1 Denials: (effective January 2024)** Medicaid denies pharmacy claims for non-behavioral health drug classes if the prescriber is not enrolled. Pay & Report for behavioral health drugs.
- **Phase 2 Denials: (effective July 1, 2024)** Medicaid will deny ALL pharmacy claims regardless of drug class if the prescriber is not enrolled.

Rx Summary: January - mid-March

	RX Count - Unenrolled Prescriber	% of Total FFS Rx Claims - Unenrolled Prescriber
Non-BH Drug Phase 1 - Denied Prescriptions	2,498	0.32%
BH Drug Phase 2 - Soft Edits (Paid Prescriptions)	53,561	6.25%

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: Prescribers

- Direct mail to 7,100 prescribers using federal NPI registry contact information.
- Personalized outreach to high-frequency prescribers.
- Partner with stakeholders, provider organizations, and professional groups (e.g., MedChi, MHA, CBH, Maryland Psychiatric Society, SUD/addiction medicine community).
- Work with hospitals to enroll any prescribing practitioners, including students/trainees.
- Pharmacy messaging on claims from unenrolled prescribers starting in Nov 2022.

Current Outreach Efforts: Participants

Bilingual mailing to Medicaid participants who have been recently prescribed medications by unenrolled prescribers.

- Information on upcoming changes.
- Education on how to check if their prescribers are enrolled.
- Support finding new prescribers if their current prescriber will not enroll.
- Safety and crisis contact information.

Internal Preparation for Go-live

- Medicaid is handling an influx of provider applications and requests for support.
- Developed scripts and policy briefings for any hotline or call center that may receive calls from providers or participants.

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.

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.

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.

Medicaid Participant Resources

- Contact Medicaid Beneficiary Services for help finding a prescriber enrolled in Medicaid: **1-800-492-5231 - Option #2.**
- Medicaid is creating a searchable directory of Maryland Medicaid providers.
 - Estimated availability: June 1, 2024

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