


GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Health Care Finance



Office of the Senior Deputy Director/Medicaid Director

Transmittal # 18-15

TO: All providers who refer, order, or prescribe items, services, or medications to D.C. Medicaid beneficiaries

FROM: Claudia Schlosberg, J.D. 
Senior Deputy Director and State Medicaid Director

DATE: April 5, 2018

SUBJECT: Medicaid Enrollment Requirement for Providers Who Order, Refer, or Prescribe Items, Services, or Medications to D.C. Medicaid Beneficiaries

The purpose of this transmittal is to notify providers who order, refer, or prescribe items, services, or medications to D.C. Medicaid beneficiaries of the requirement to enroll in the D.C. Medicaid program.

Per the Affordable Care Act and implementing federal regulations, all providers (including those who participate in fee-for service and those who are participate in a DC Medicaid MCO provider network) who order, refer, or prescribe (“ORP providers”) items, services, or medications to D.C. Medicaid beneficiaries **must** enroll in the D.C. Medicaid program.¹ All claims for payment for items/services that were ordered, referred, or prescribed, **must** contain the National Provider Identifier (“NPI”) of the ORP provider. The NPI number on the claim must be for the **individual** ORP provider.² It is **insufficient** to include the organizational NPI. This means that individual ORP providers must enroll in D.C. Medicaid, even if the organization by which the ORP provider is employed (including Federally Qualified Health Centers) is enrolled. Enrolling as an ORP provider does not obligate you to see fee-for-service Medicaid beneficiaries.

¹ 42 C.F.R. § 455.410(b) provides that the state Medicaid agency must require all ordering, prescribing, or referring physicians or other eligible professionals providing services under the State Plan, or under a waiver of the Plan, to be enrolled as participating providers.

² 42 C.F.R. § 455.440 provides that the state Medicaid agency must require all claims for the payment for items and services that were ordered, prescribed, or referred to contain the National Provider Identifier (NPI) of the physician or other professional who ordered, prescribed, or referred such items or services.

To summarize, the ORP NPI number on submitted claims must:

1. Belong to a provider who is enrolled in D.C. Medicaid;
2. Correspond to an individual provider, and **not** be an organizational NPI; and
3. Correspond to a provider type that is eligible to order, refer, or prescribe.

The following individual providers are eligible to order, refer, or prescribe within the D.C. Medicaid program and within their scope of practice:

1. Audiologist
2. Dentist
3. Doctor of Osteopathy
4. Nurse Midwives
5. Nurse Practitioner
6. Optician/Optical Dispensary
7. Optometrist
8. Physician, MD
9. Physician Assistant
10. Podiatrist

Please note this requirement also applies to Medical Residents and Interns who have an active Medical Training License to practice medicine in the District of Columbia. DHCF will be sending out additional guidance to address their enrollment shortly.

DHCF offers a streamlined enrollment application for ordering, referring, and prescribing providers, available at <https://www.dcpdms.com/Account/Login.aspx>. There is **no application fee** associated with the Streamlined Application. For any questions regarding the ORP enrollment mandate, please contact Mike Brown, Manager of the DHCF Division of Public and Private Provider Relations at (202) 698-2044, or by e-mail at mikel.brown@dc.gov

cc: Medical Society of the District of Columbia
DC Hospital Association
DC Primary Care Association
DC Board of Nursing
DC Health Care Association
DC Home Care Association
DC Behavioral Health Association
DC Coalition of Disability Service Providers