LEA Medi-Cal Billing Option Program
Ordering, Referring and Prescribing (ORP) Frequently Asked Questions

1. **Do the ORP requirements apply only to Individualized Education Program (IEP) services or also to Non-IEP services?**

   Answer: The ORP requirements apply to both IEP and Non-IEP treatment services. The ORP requirements do not apply to assessment services.

2. **Will the school district need all rendering practitioners to individually apply for a Type 1 NPI and enroll as a Medi-Cal participating provider via the PAVE portal if they are treating a student for a non-assessment service?**

   Answer: The requirement is for the practitioner that orders, refers or prescribes a treatment service, to have a NPI and be enrolled as a Medi-Cal ORP practitioner. The requirement is not for the rendering practitioner.

3. **When the ORP is an individual employed by an outside agency who is contracted with the LEA, is it the agency's NPI that needs to be enrolled with Medi-Cal and listed as the ORP, or the individual's NPI that should be enrolled with Medi-Cal?**

   Answer: The individual ORP practitioner should have the NPI and be enrolled in Medi-Cal as an ORP provider.

4. **A qualified nurse provides nursing treatment services which are prescribed and included in a student's IEP. Does this nurse need to have a Type 1 NPI and be enrolled as a Medi-Cal ORP provider?**

   Answer: No, for nursing treatment services, the nurse does not need to have a Type 1 NPI and be enrolled as a Medi-Cal ORP provider. Nurses are not ORP providers for nursing treatment services. Qualified ORP practitioners for nursing treatment services include the following:

   > Medication and therapeutic agent administration: Licensed Clinical Psychologist; Dentist, Physician; Podiatrist

   > Specialized physical health care and other nursing services: Physician

   Registered credentialed school nurses are only ORP providers if they recommend psychology and counseling treatment services. In this case, they would need a Type 1 NPI and be enrolled as a Medi-Cal ORP.

5. **Do you have any recommended language for school districts to add to existing prescriptions for practitioners to acknowledge and authorize that school districts will be utilizing their Type 1 NPI and Medi-Cal participation?**

   Answer: DHCS will not recommend any particular language for LEAs to add to prescriptions. However, an LEA may add such language as part of its internal check for program compliance.

6. **Can LEAs bill for services for which the prescription was created prior to the ORP practitioner's Medi-Cal enrollment?**

   If the ORP practitioner submitted a Medi-Cal application to Provider Enrollment Division (PED) after the date of prescription, LEAs may still validly submit claims for the subsequent treatment services resulting from that prescription. For example, a physician writes a prescription on September 3, 2018. On September 7, they submit the Medi-Cal application to PED. The first treatment service is on September 12. Since the physician submitted a Medi-Cal application to PED on September 7, they may bill for treatment services beginning with the September 12 service.

   In an alternate scenario, an existing prescription was written January 1, 2018. Treatment services commenced on January 10, 2018 and continued through December of 2018. The physician submits the Medi-Cal application to PED on July 15, 2018. The LEA may submit claims for services from January 10, 2018 through June 30, 2018, and for services on or after July 15, 2018. As stated in PPL 18-018, this policy applies for services with dates of service on or after July 1, 2018.

7. **If claims do not contain the ORP NPI after July 1, 2018, will they be denied?**

   Answer: Currently, if claims do not contain the ORP NPI they will not be denied because the claims adjudication system is in the process of being updated and there is no estimated completion date. However, there is an audit risk, and claims that do not contain the ORP NPI may be recovered in an audit.

8. **The Medi-Cal ORP enrollment process takes up to 180 days. The LEA is legally bound to provide services as prescribed and documented in the IEP. How will claims be handled for ORP NPIs for whom the application process has not been completed?**

   Answer: The Medi-Cal enrollment will be effective from the date the Medi-Cal application as an ORP practitioner is received by (PED. If claims are submitted that include an ORP NPI who has not submitted a Medi-Cal application to PED, the claims will not be denied because the claims adjudication system does not recognize whether the ORP NPI is enrolled in Medi-Cal. However, there is an audit risk, and claims which are submitted that include an ORP NPI who has not submitted a Medi-Cal application to PED may be recovered in an audit.

9. **For LEAs whose billing model is a mix of employed and contracted service providers, will the contracted providers use a separate NPI than the employed providers? For example: a physician authorizes speech protocols for the district as a whole - will that physician's NPI be used for all speech services regardless of whether the speech pathologist is employed or contracted?**

   Answer: The requirement is for the practitioner that orders, refers or prescribes a treatment service, to have a NPI and be enrolled as a Medi-Cal ORP practitioner. The requirement is not for the rendering practitioner. Note that if a speech language pathologist/licensed audiologist refers for services pursuant to a physician-based standards protocol, it is the physician who developed the physician-based standards protocol who is considered the Medi-Cal ORP provider, and it is their NPI that must be included on the claim for Medi-Cal reimbursement.

   *Remember: **Medi-Cal ORP Frequently Asked Questions** are located on the ORP page of the Medi-Cal website.*