Medi-Cal Provider Enrollment – Frequently Asked Questions (FAQs)

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DHCS
CALIFORNIA DEPARTMENT OF
HEALTH CARE SERVICES

Pursuant to *Code of Federal Regulations* (CFR), Title 42, Section 455.410(b), and *Welfare and Institutions Code* (W&I Code), Section 14043.26(a), the Department of Health Care Services (DHCS) is required to ensure all Ordering, Referring, and Prescribing (ORP) providers are enrolled in Medi-Cal.

This Frequently Asked Questions (FAQs) document provides guidance and clarification regarding Medi-Cal provider enrollment requirements.

1. **What changes are taking place?**

   Beginning soon, prescribers (such as doctors, nurse practitioners, or physician assistants), as well as pharmacists initiating prescriptions under their own scope of practice authority, must be enrolled using their individual (Type 1) National Provider Identifier (NPI). This will be required in order for pharmacy providers to dispense medications to Medi-Cal members and receive paid claims under Medi-Cal Rx. More information regarding an exact enforcement date will be released as soon as it is available.

2. **Whom will the policy impact?**

   This policy will impact all prescribers, as well as pharmacists initiating prescriptions under their own scope of practice authority, who have not enrolled as Medi-Cal providers using their individual (Type 1) NPI. Members may experience some downstream impacts as the claim for their prescription may be denied when billed to the pharmacy provider, with no overrides available, for any prescriber that is not enrolled.

3. **Will DHCS backdate the date of enrollment to the date the application was submitted?**

   In most cases, the effective date is the date the application is received, unless otherwise specified in regulation. For the ORP enrollment type, the effective date is one year prior to the date the application is received. Refer to the Enrollment Effective Date for Ordering/Referring/Prescribing Providers page on the DHCS website for more information.

4. **I am a prescriber; how can I verify my enrollment status?**

   Confirm your enrollment as a Medi-Cal provider via the *Enrolled Providers* list. Once on the page, scroll down to the search field on the right and enter your individual NPI to verify your enrollment status.

   - If your individual NPI is found on the *Enrolled Providers* list, then you have met the prescriber Medi-Cal enrollment requirement and no further action is required.
   - If your individual NPI is not found on the *Enrolled Providers* list, then you will need to submit an application with DHCS' Provider Enrollment Division (PED) as soon as possible to allow sufficient time for processing and approval.

5. **I practice in multiple counties. Do I have to submit an application in the Provider Application and Validation for Enrollment (PAVE) Portal for each county?**

   No. You should submit only one application.

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6. **If I enroll with Medi-Cal, am I required to provide care to Medi-Cal members? Does this requirement come with additional responsibilities such as treating a minimum number of Medi-Cal members?**

   No. Enrolling with Medi-Cal as a prescriber does not bind you to any additional responsibilities with respect to caring for one or more Medi-Cal members. Enrolling with Medi-Cal does enable you to prescribe for a Medi-Cal member for whom you have assumed responsibility as their health care provider.

7. **Do all prescribing providers enroll as ORP providers or are there alternate provider classifications or categories under which providers can enroll?**

   All prescribing providers need to enroll using their individual (Type 1) NPI. Prescribers may be enrolled as a Rendering, Non-Physician Medical Practitioner (NMP), Billing, or ORP Only provider. If a provider has an active enrollment with their individual NPI as a Billing, Rendering, or NMP provider, they have met the enrollment requirement and should not submit an ORP application.

8. **Are interns and residents in training programs required to enroll in Medi-Cal?**

   All providers eligible for a postgraduate training license or full licensure must enroll with their individual NPI with Medi-Cal in order for pharmacy claims to be reimbursed. Providers who are not eligible to enroll must submit prescriptions using a Medi-Cal enrolled supervising licensed practitioner. Non-licensed trainees are not eligible prescribers in California and are not permitted to transmit prescriptions under their own authority.

9. **If a newly hired pharmacist had already enrolled with their prior employer, do they have to re-enroll?**

   No. ORP providers are not currently required to report when they change employers. The ORP enrollment is an individual enrollment that is not linked/affiliated to a specific employer or address. Providers can verify enrollment as a Medi-Cal provider via the *Enrolled Providers* list.

10. **Does being contracted with a Medi-Cal managed care plan (MCP) or enrolled in the federal Medicare program satisfy Medi-Cal provider enrollment requirements?**

    No. Being contracted with a Medi-Cal MCP and/or enrolled as a provider with the federal Medicare program is not sufficient to meet the requirements for Medi-Cal enrollment. You must separately apply and be approved by DHCS' PED.

11. **Do enrolled providers need to revalidate? If so, how often?**

    Yes. Federal rules require providers to revalidate at least every five years. Providers will be notified when they are due for revalidation.

12. **Are all providers subject to the $750 application fee to enroll with Medi-Cal via PAVE?**

    No. There is no fee associated with an ORP application. Individuals are not subject to the application fee.

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13. **Can administrative staff (such as an office manager) submit Medi-Cal provider enrollment applications for one or more prescribers through the PAVE Portal, or does each individual prescriber need to submit their own application?**

    Administrative staff, such as an office manager, can prepare an application on the prescriber's behalf, but the prescriber must create their own unique username and password to access the Medi-Cal provider enrollment application in the PAVE Portal to review the information and to complete the Provider Agreement and signature. Signatures cannot be delegated to any other person.

14. **How is Medi-Cal Rx preparing pharmacy providers and prescribers for the upcoming policy changes?**

    Medi-Cal Rx has identified prescribers who have not enrolled with Medi-Cal and will be conducting proactive outreach to inform them of this requirement. Medi-Cal Rx will also be sharing information with and providing technical assistance to Medi-Cal MCPs so that they can inform their contracted network providers of this requirement since most prescribers are going to be affiliated with a Medi-Cal MCP. If a Medi-Cal provider enrollment application is not submitted and approved when policy enforcement begins, pharmacy claims and prior authorization (PA) requests associated with the prescriber will be denied.

15. **What is the typical processing time for Medi-Cal provider enrollment applications submitted to DHCS' PED through PAVE?**

    Physician applications will receive a response within 90 days; all other license types (such as nurse practitioner or physician assistant) will receive a response within 180 days. Applicants can view the real-time status of their application by viewing the application milestone in the PAVE Portal. Applications are processed as quickly as possible in the order that they are received. Note that some applications may require additional information in order to be processed, which can result in processing delays.

16. **I have already enrolled with Medi-Cal Rx and am having no issues getting medications for my Medi-Cal patients. Is that sufficient?**

    No. To meet federal requirements, prescribers must enroll with Medi-Cal using their individual NPI. Enrollment with Medi-Cal Rx provides access to the Medi-Cal Rx Provider Portal, but it is not sufficient to meet Medi-Cal provider enrollment requirements. With enforcement of federal regulations, Medi-Cal members will no longer be able to obtain their prescriptions written by non-enrolled providers.

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17. **Materials published on the Medi-Cal Rx Web Portal are specific to prescribers. Is DHCS also requiring non-prescribing providers to enroll in Medi-Cal in order to submit medical claims, claims for durable medical equipment (DME), etc.? If so, what is the application deadline and where can I find more information?**

    All ORP providers that support Medi-Cal members must enroll with their individual NPI.

    For information about provider enrollment relative to medical claims, refer to the *Important Reminder: Ordering, Referring and Prescribing (ORP) Enrollment Requirements* article and the Provider Enrollment page on the DHCS website.

18. **What should a pharmacist say to a member if their pharmacy claim is denied due to non-enrollment?**

    The pharmacist should notify the member that the prescriber is not enrolled with Medi-Cal and advise the member to contact their provider. If the member is enrolled with an MCP, they may also be advised to contact the health plan's Member Services department for additional assistance. The number for Member Services is located on the health plan membership card, not the Medi-Cal Benefits Identification Card (BIC).

19. **Where can I find more information about Medi-Cal provider enrollment requirements?**

    - Visit the Provider Enrollment Requirement tab on the Education & Outreach page.
    - Navigate to the Provider Inquiry form to submit requests for assistance to DHCS' PED.
    - Refer to the Ordering/Referring/Prescribing Only Enrollment Information page or the Ordering, Referring, Prescribing (ORP) Enrollment slide deck.
    - Visit the Application Information by Provider Type page on the DHCS website for more information about prescriber enrollment options (such as a Doctor of Medicine, ORP [Ordering/Referring/Prescribing] Only Enrollment, Nurse Practitioner, etc.) as well as each provider type's qualifications and requirements for application submission.

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