



Medicaid Ordering/Prescribing/Referring/Attending (OPRA) Guidance for OASAS Certified Providers

Introduction:

This document is intended to refresh providers' understanding regarding Medicaid enrollment and the appropriate use of the ordering, prescribing, referring and/or attending (OPRA) information in claiming as given in the [December 2013 NYS Medicaid Update](#).¹ Inaccurate or inappropriate use of OPRA information can lead to audit liabilities and possible recoupment of payment.

eMedny's [OPRA Provider Enrollment FAQ's](#) provides further information pertinent to the need for appropriate use of NPI's in claiming.

National Provider Identifier (NPI):

The NPI is a 10 digit number used to identify HIPAA covered providers or those who provide Medicare reimbursable services.

Generally, there are two types of health care provider's in terms of NPI's. Both Type 1 and Type 2 NPI's as given below must be obtained if the individual or organization wants to enroll in Medicaid.

- **Type 1** — Health care providers who are **individuals**, including physicians, dentists, and all sole proprietors. These individuals and their NPI's may be listed under a Type 2 NPI, Facility. (**OASAS Licensed Clinical/Medical Staff**)
- **Type 2** — Health care providers who are **organizations** (**OASAS Certified Providers**), including physician groups, hospitals, nursing homes, and the corporation formed when an individual incorporates him/herself. ⁱ
- **Unlicensed Practitioner NPI** – OASAS staff who are not eligible for a Type 1 NPI utilize the OASAS Unlicensed Practitioner ID, 022491145, in the attending field on the claim form.

For further information on obtaining an NPI number please visit the [CMS How to Apply webpage](#).

¹ And as an update to [OASAS OPRA Guidance of 2014](#).

Provider Enrollment:

OASAS Certified Providers **must**

- [Enroll in Medicaid](#)ⁱⁱ if they intend to seek Medicaid reimbursement.
- Via the [eMedny Facility Practitioner NPI Form](#)
 - **identify** the NPI number, of professionals within their organization who will be listed in the ordering, prescribing, referring and/or attending section(s) (OPRA) of the claim. **eMedNY's [Enrolled Practitioners Search](#)** can be used to identify a practitioners status.
 - **report** the NPI and associated License Numbers for attending providers that will be included on claims submitted to NYS Medicaid by the facility.
 - **maintain** a separate roster of attending provider's NPIs and License Numbers for each facility NPI within their organization.
 - **maintain an up-to-date "roster"** of attending providers that are affiliated with the facility.ⁱⁱⁱ

Attending providers included in the claims **must be** affiliated with the facility NPI on the claim's date of service. If the affiliation effective start and inactive date for the Attending Provider are not inclusive of the date of service, **the claim will be denied.**^{iv}

In the past Claims adjudication edits regarding the Attending Provider not being affiliated with the facility did not always lead to claim denial. As of November 1, 2020, this edit will be removed for OASAS providers and eMedny will deny claims where an attending Provider is not affiliated with the OASAS facility. Providers are encouraged to review their rosters to ensure all practioners are enrolled in Medicaid and appropriately affiliated,

Claiming:

When submitting claims to Medicaid for reimbursement, the claim form, whether paper or electronic, include fields for relevant NPI codes, **Billing, Ordering/Referring, and Attending.**

Billing (Field 56) – the NPI of the agency/facility where the service(s) was rendered.

Ordering/Referring (Field 78 or 79) - a healthcare practitioner who orders/refers Medicaid reimbursable services. Any practitioner reported as ordering/referring on a Medicaid claim **must** be enrolled² in the Medicaid program. The order or referral must be within the professional's scope of practice and comply with program rules regarding ordering/referrals.

For OASAS purposes the treatment plan is considered an "order" for services. As such ordering/referring practitioners include **Physicians, Nurse Practitioners, Physicians Assistants, Licensed Psychologist, Licensed Clinical Social Workers**

² There are certain licensed/credentialed practitioners that cannot become an enrolled Medicaid provider: Licensed Master Social Worker (LMSW), Licensed Marriage and Family Therapist, Licensed MH Counselor, Licensed Creative Arts Therapist, Applied Behavioral Analyst, Credentialed Alcohol and Substance Abuse Counselor (CASAC), and Peer.

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Attending (Field 76) – the NPI of the individual who provided the ordered/referred service.

- Licensed **and** enrolled³ in the Medicaid Program
 - **Does not require** that ordering/referring field be completed.
- Licensed **but not** enrolled in Medicaid Program
 - Utilize NPI associated with the license, **AND**
 - Ordering/Referring field must be completed
- Unlicensed **and not** enrolled in Medicaid Program
 - Utilize OASAS unlicensed practitioner NPI, 02249145, **AND**
 - Ordering/Referring field must be completed

As noted previously, attending providers included in the claims **must be** affiliated with the facility NPI on the claim's date of service. If the affiliation effective start and inactive date for the Attending Provider are not inclusive of the date of service, **the claim will be denied.**

For questions concerning this guidance please email either PICM@oasas.ny.gov or Legal@oasas.ny.gov

i [CMS NPI Guidance](#)

ii [Provider Enrollment Form](#)

iii [eMedny Facilities Practitioner NPI Reporting FAQ's](#)

iv [Facilities Practitioner's NPI Reporting Guide](#)

³ There are certain licensed/credentialed practitioners that cannot become an enrolled Medicaid provider: Licensed Master Social Worker (LMSW), Licensed Marriage and Family Therapist, Licensed MH Counselor, Licensed Creative Arts Therapist, Applied Behavioral Analyst, Credentialed Alcohol and Substance Abuse Counselor (CASAC), and Peer.