

## PROVIDER ALERT

## Prescriber Enrollment Requirement for Behavioral Health Practitioners

February 23, 2024

# Target Audience: All Prescribing Behavioral Health Practitioners

Effective July 1, 2024, Medicaid will deny **all pharmacy claims** that do not include the National Provider Identifier (NPI) of a prescribing practitioner who is actively enrolled with Maryland Medicaid, in accordance with Section 6401 of the Affordable Care Act and Code of Federal Regulations section 42 CFR § 455.410(b). This federal rule requires all Ordering, Referring, and Prescribing (ORP) practitioners be enrolled with the Maryland Medicaid program.

Maryland Medicaid has undertaken extensive outreach over several years to ensure provider enrollment. Pharmacy denials occur at the point-of-sale, and may result in patients' inability to receive their prescription drugs. Failure to enroll in the Medicaid Program while rendering care to Medicaid participants harms patients who cannot access the medications and services they need. Therefore, Medicaid requests that all practices and prescribing practitioners treating Medicaid patients enroll with Maryland Medicaid as soon as possible.

### **Actions required:**

- All prescribing practitioners treating Medicaid participants must enroll with Medicaid as soon as possible, and no later than April 15, 2024.
- Prescribing practitioners may enroll either as a fully participating provider, or as an Ordering, Referring and Prescribing (ORP)-only Provider. An ORP-only provider does not bill Medicaid for services or sign a full Medicaid Provider Agreement.
- Some practitioners may not know their enrollment status. Verify prescribers' enrollment status using the <a href="Provider Verification System">Provider Verification System</a>.
- Prescribers must enroll via the ePREP Portal.
- <u>Provider Groups and Facilities</u>: Notify all prescribing practitioners in your organization about the enrollment requirement and facilitate their enrollment via ePREP.

**NOTE:** This requirement makes no changes to how behavioral health practices bill to Medicaid for rendered services. Outpatient Mental Health Clinic's (OMHCs) should continue to submit claims to Medicaid with the OMHC organizational NPI in the rendering provider field. However,

any rendering providers who are prescribing to Medicaid participants must enroll to ensure their patients can access the drugs after July 1st, 2024.

#### **Providers Resources:**

- For assistance with ePREP application, please call the ePREP hotline:1-844-463-7768
- ePREP Enrollment guidance and training: https://health.maryland.gov/mmcp/provider/Pages/eprepresources.aspx
- ORP Providers and Prescribing Practitioners information: https://health.maryland.gov/mmcp/provider/Pages/opr
- Provider Verification System (PVS):
  https://encrypt.emdhealthchoice.org/searchableProv/main.action
- For questions related to ORP enrollment policy: Email to <a href="mailto:mdh.rxenroll@maryland.gov">mdh.rxenroll@maryland.gov</a>

Thank you,

Optum Maryland Team