

Ordering, Referring, and Prescribing (ORP) Provider Enrollment – Consolidated FAQ

Overview

To enhance program integrity, the Centers for Medicare & Medicaid Services (CMS) requires all providers (including out of state) who **order, refer, or prescribe** to Medicaid recipients to enroll with the South Carolina Department of Health and Human Services (SCDHHS), even if they do not bill directly for services. This requirement applies to **professional, pharmacy, and institutional claims**. SCDHHS has implemented this requirement in alignment with federal regulations.

Federal Requirements

What is the federal requirement for ORP providers?

Under 42 CFR § 455.410(b) and Section 6401 of the Affordable Care Act (ACA), any physician or other professional who orders, refers, or prescribes to Medicaid patients must enroll in the state Medicaid program. Additionally, 42 CFR § 455.440 requires all claims for items and services ordered or referred to contain the National Provider Identifier (NPI) of the ordering or referring provider.

Who must enroll?

Physicians (MD, DO), nurse practitioners, physician assistants, dentists, clinical nurse anesthetists, optometrists, and any licensed health care professional authorized to perform ORP functions. This includes the following types of medical professionals, even if they only order, refer or prescribe services for Healthy Connections, Medicaid members.

- Chiropractors;
- Dentists (including oral surgery, pedodontics, orthodontics);
- Optometrists;
- Nurse practitioners, midwives, certified registered nurse anesthetists, physician assistants;
- Physicians (all specialties); and
- Podiatrists

Does this requirement apply across all states?

Yes. Providers must enroll in each state Medicaid program where they render ORP services, regardless of enrollment in another state.

Do out-of-state providers need to enroll?

Yes. Out-of-state providers must enroll if they provide ORP services to beneficiaries of another state's Medicaid program.

Enrollment Details**Is a National Provider Identifier (NPI) required?**

Yes. Individual NPIs must be used. Organizational NPIs are not permitted for ORP roles.

Does ORP enrollment allow billing?

No. ORP enrollment allows for referral, ordering, or prescribing, but not billing. Full enrollment is required to bill Medicaid directly.

Is revalidation necessary?

Yes. Providers must revalidate enrollment periodically (typically every five years) to remain compliant.

What if I'm already enrolled in Medicaid or Medicare?

If you are already enrolled as an active billing or rendering provider with your individual (Type 1) NPI in Medicaid or Medicare, you do not need to enroll again as an ORP provider. However, if you are enrolled with your organizational (Type 2) NPI, you must enroll with your individual (Type 1) NPI for ORP purposes.

What if my services are billed by my group, clinic, or hospital?

Each provider must still be enrolled individually. Group or institutional enrollment is insufficient for ORP compliance.

Claim Requirements**What must be included on a claim?**

- The NPI of the ORP provider.
- The provider must be enrolled with the appropriate SCDHHS Medicaid program as of the date of service.
- All pharmacy claims must identify the prescribing provider.
- Incorrect or missing enrollment information can lead to claim denials.

What happens if I don't enroll?

If the ORP provider's NPI on the billing provider's claim is not enrolled in the SCDHHS Medicaid program, claims from billing providers (pharmacies, DME providers, etc.) will be denied.

Can claims be resubmitted if initially denied?

Yes. Once the ORP provider is enrolled, claims can be resubmitted as long as they are resubmitted within the timely filing limits.

What providers must include ORP information on a claim?

The following provider types/specialties are always required to include the NPI of the ORP provider on claims:

Provider Type Description	Provider Specialty Description
Pharmacy	All
Laboratory	No Specialty
Independent X-Ray (Portable/Free Standing) & Physiology Lab	All Specialties
Optician, Individual	Optician
Home Health	No Specialty
Other Medical Professionals	Physical Therapist / Occupational Therapist / Speech Pathologist
Durable Medical Equipment	All Specialties

South Carolina-Specific Requirements**Does South Carolina Medicaid require ORP enrollment?**

Yes. In alignment with federal regulations, the South Carolina Department of Health and Human Services (SCDHHS) mandates that any provider who orders, refers, or prescribes must be enrolled as either a billing or non-billing provider.

How can South Carolina providers enroll?

Enrollment can be initiated via <https://www.scdhhs.gov>. Providers may register as a non-billing provider if their sole function is ORP-related. Refer to the power point below for additional enrollment guidance.

How long does the enrollment process take?

SCDHHS ORP-only enrollment follows similar timeframes to other standard full provider enrollment: typically, within 30 days.

How to check ORP enrollment status in SC?

Providers and billing agents can verify enrollment through the SCDHHS provider portal or by contacting Provider Services at 1-888-289-0709.

Frequently Asked Questions**If I do not want to be reimbursed for my services, do I still need to enroll?**

Yes. If you order, refer, or prescribe items or services to South Carolina Medicaid members, you must enroll as an ORP provider. Failure to enroll can result in the order, referral, or prescription being denied and the patient not receiving needed services.

I am currently enrolled as an active Medicaid billing provider. Do I need to enroll as an ORP provider?

No. Providers already enrolled as active billing or rendering providers with their individual NPI do not need to enroll again as an ORP provider.

If I enroll as an ORP provider, will I be able to bill Medicaid directly?

No. ORP providers enroll solely for the purpose of ordering, referring, or prescribing items or services. To bill Medicaid directly for services provided, you must submit a full application package and enroll as a billing provider.

Resources

- **CMS NPI Registry:** <https://npiregistry.cms.hhs.gov>
- **Federal Regulation:** 42 CFR § 455.410 – <https://www.ecfr.gov>
- **SC Medicaid Enrollment Portal:** <https://www.scdhhs.gov>
- **General ORP Guidelines:** <https://www.medicaid.gov>