

Ordering, Prescribing, Referring, Attending (OPRA) Prescription Requirements for Unlicensed Residents, Interns and Foreign Physicians in Training

In December 2013, New York State (NYS) Medicaid issued a Special Edition (Vol.29, No.13) of the Medicaid Update to provide enrollment requirements and guidance for all ordering, prescribing, referring, and attending (OPRA) servicing/billing providers:
http://www.health.ny.gov/health_care/medicaid/program/update/2013/dec13_muspec.pdf

The purpose of this update is to provide information regarding OPRA prescription requirements for unlicensed residents, interns and foreign physicians in training.

- NYS Medicaid recognizes prescriptions written by providers legally authorized to prescribe per NYS Education Law Article 131 Section 6526 and 10NYCRR 80.75(e). This includes unlicensed residents, interns and foreign physicians in training programs, under the supervision of a NYS Medicaid enrolled physician.
- In accordance with NYS Education Law, NYS Medicaid does NOT require the name and signature of the supervising physician to be included on the prescription. However, in order to enable billing by the dispensing pharmacy, prescriptions written by unlicensed residents must include the NPI of the supervising/attending physician who is enrolled in Medicaid (see last bullet point below regarding billing requirements).
- NYS Medicaid only enrolls licensed providers. As a result, unlicensed residents, interns or foreign physicians in training programs are not eligible for enrollment as NYS Medicaid providers.
- Effective January 2014, NYS Fee-For-Service (FFS) Medicaid implemented claims editing that enforced the OPRA requirement for healthcare professionals, practice managers, facility administrators, and servicing/billing providers. Therefore, pharmacy claims for services ordered by unlicensed residents, interns and foreign physicians in training programs reject when initially submitted for payment.

The following options are available to pharmacies, to enable payment:

- Resubmit the claim, using the National Provider Identifier (NPI) of the enrolled NYS Medicaid provider (the intern or resident's supervising physician).

- In the event the NPI number of the supervising physician cannot be obtained, or the pharmacy's billing system is limited to submitting only one prescriber NPI number, then use the override option (outlined below).

Directions for the urgent/emergency override option:

If you have a prescription written by an unlicensed resident, intern or foreign physician in a training program you will receive a reject code of "56" via NCPDP transaction stating the provider has a non-matched Prescriber ID listed in NCPDP field number 511 -FB. For claims prescribed by unlicensed residents interns or foreign physicians in training programs, pharmacies are allowed to provide the medication and receive reimbursement by resubmitting the claim using the following emergency override procedure:

- In the Reason for Service Code Field (439-E4) also known as the Drug Utilization Conflict Field – enter **"PN"** (Prescriber Consultation)
- In the Result of Service Code Field (441 -E6) – enter one of the following applicable values **(1 A, 1 B, 1 C, 1 D, 1 E, 1 F, 1 G, 1 H, 1 J, 1K, 2A, 2B, 3A, 3B, 3C, 3D, 3E, 3F, 3G, 3H, 3J, 3K, 3M, 3N, or 4A)**
- In the Submission Clarification Code Field (420-DK) also known as the Drug Prescription Override Field – enter **"02"** (Other Override)

Contact the eMedNY Call Center at (800) 343-9000 for questions regarding this billing requirement.