



Ordering, Prescribing, Referring (OPR) Stakeholder Engagement Questions & Answers

This document summarizes:

- Unanswered stakeholder questions received during Colorado Department of Health Care Policy & Financing (the Department)'s Ordering, Prescribing, and Referring (OPR) stakeholder engagement sessions for Audiology, Speech Therapy, Hospice, and Physical and Occupational Therapy benefits held March 2024-June 2024.

Below each item, the Department has provided an *interim* response.

Important Note: There are several stages of policy development and implementation. Any responses in this document represent a snap-shot of the Department's position as of [date] and should not be read as final policy determination.

Where can I find meeting recordings and updates shared in the OPR stakeholder meetings?

- [Audiology Meetings](#)
- [Physical and Occupational Therapy Meetings](#)
- [Speech Therapy Meetings](#)

Provider Eligibility

How do I ensure a provider is actively enrolled with Health First Colorado before submitting a claim?

- You may access the [Find a Provider Tool](#), contact the Gainwell Call Center, or utilize the [revalidation spreadsheet](#) located on the Department website. Please download the Provider Revalidation Dates spreadsheet to verify the next revalidation due date. This spreadsheet is updated **every Monday**. Providers will be contacted via email approximately 6 months before their revalidation deadline with further instructions. Attempting to revalidate by completing a new application before being notified will create duplicate enrollments and can cause claim processing issues.



- The Department kindly asks all providers to ensure the most up-to-date email is on file to ensure the revalidation emails are not missed.

Will it be clear whether it is the ordering, prescribing, or referring provider if claims are denied due to the provider not being enrolled with Health First Colorado?

- If the OPR was correctly entered and the claim is denied, the denial is due to the OPR provider not being enrolled or needing to complete revalidation.
- Whichever of the 3 fields the provider uses to populate with the OPR NPI number, all 3 behave the same. If the NPI number entered in one of those fields is invalid, then the OPR edit will deny the claim. Being “invalid” means that 1. The NPI is that of an enrolled provider, but that provider type isn’t allowed to provide specific services, or 2. The provider/ NPI isn’t enrolled with Health First Colorado. The EOB is not specific, it will read “The referring, ordering, prescribing, or attending provider is missing or not enrolled”.

Can a provider submit claims under another provider’s NPI at the same clinic until the provider’s Health First Colorado enrollment is complete?

- No.

How do providers enroll with Health First Colorado?

- Provider Enrollment information can be found on the [Provider Enrollment web page](#).

Is there a grace period once a provider’s enrollment has expired?

- No.

Can we use an agency, group, or practice NPI rather than a provider NPI on a claim?

- No, it must be the individual NPI number, claims will be appropriately denied if a group NPI number is utilized.

Will claims deny if the ordering provider’s enrollment lapses mid-treatment?

- OPR enrollment span must encompass the date of service on the claim.



If a Medicaid member's provider signed off on the PAR, and the provider changes mid-treatment, should the claim be updated with the new provider's NPI?

- Acentra would only know of a provider change if a new PAR was requested. If services were duplicative, then Acentra would request a change of provider (COP) form to close the old PAR and allow the new PAR to be created.

Claim Submission

Will Acentra deny a request if OPR is not enrolled?

- Yes. Acentra's system, Atrezzo, will **NOT** allow a provider to start a PAR if the provider NPI is not active. Atrezzo uses the same data as Gainwell, so an inactive provider would not be active within Atrezzo to begin a new PAR. There would be denial due to the PAR not being allowed to be started.

Are both the referring and ordering fields required?

- No.

What is the difference between referring and ordering?

- They are different electronic claim field indicators, either are acceptable to be used.

In a case where a provider has more than one NPI listed in the portal, will it be necessary to manually select one of the numbers during claim submission?

- Yes, the correct NPI will need to be selected for the claim during submission.

Is there a way to view claims when billing electronically?

- Claims can be viewed on the [Provider Web Portal](#). Provider trainings are hosted by the Department and can be located [Provider Training web page](#).

Will there be a place to enter NPI for the ordering provider in Acentra?

- Yes, the PAR submissions do have an OPR field. However, it does not map to the claim. They will need to be entered on both.



If the ordering provider no longer has a valid NPI because it lapsed, will claims for services that were prior authorized be denied?

- Yes.

Can I resubmit the claim after a provider is actively enrolled if the claim was originally denied because the provider wasn't yet enrolled or re-enrolled with Health First Colorado?

- Yes, as long as it is within timely filing.

Where can I get help with claims submissions and denials?

- For these types of questions, call the [Provider Services Call Center](#). The Department asks that providers document the representatives name that you spoke to in case there is a need to escalate.

Early Intervention

How should OPR be submitted in the case of Early Intervention providers who use an Individualized Family Service Plan (IFSP) in the order?

- In this situation, utilize the therapist's individual NPI as the OPR.

How should OPR be submitted in the case of a self-referral for Early Intervention?

- The Department recognizes that Outpatient Therapies ordered in conjunction with an approved IFSP for Early Intervention may not necessarily have an ordering provider. Under this circumstance alone the rendering provider must use their own NPI number as the OPR NPI number.

Dual Enrollment

If Medicaid is the secondary insurance, what if the ordering, prescribing, and referring provider is not a Health First Colorado provider?

- The Medicaid payment will be denied, all payment requires OPR to be valid and listed on the claim. There is no exception or allowance for secondary claims.