Ordering/Referring NPI Requirements

The Centers for Medicare & Medicaid Services (CMS) require that all physician and non-physician practitioners be uniquely identified for all services that are ordered or referred. CMS has expanded claim editing related to ordering and referring providers to meet the Social Security Act requirements. In addition, the Blue Cross Blue Shield Association (BCBSA) mandates ordering/referring National Provider Identifier (NPI) numbers for specific services.

CMS requires that claims for services that require the ordering/referring provider identification be denied if not present on the claim, or the provider is not allowed to order or refer members. Anthem Blue Cross Blue Shield Medicare Advantage plans will begin to enforce the ordering/referring provider NPI requirements and deny claims.

There are three basic requirements for ordering/referring services:

1. The physician or non-physician practitioner must be enrolled in Medicare in an approved status.
2. The ordering/referring NPI must be for an individual physician or non-physician practitioner (not an organizational NPI).
3. The physician or non-physician practitioner must be of a specialty type that is eligible to order and refer.

Only physicians and certain types of non-physician practitioners are eligible to order or refer items or services for Medicare beneficiaries. They are:

- Physician (doctor of medicine or osteopathy)
- Doctor of dental medicine,
- Doctor of dental surgery,
- Doctor of podiatric medicine,
- Doctor of optometry,
- Physician Assistant
- Certified Clinical Nurse Specialist,
- Nurse Practitioner,
- Clinical Psychologist,
- Interns, Residents, & Fellows,
- Certified Nurse Midwife, and
- Clinical Social Worker

Questions and Answers Relating to the CMS Claim Edits:

1. **What will the edits do?** The edits will determine if the ordering/referring provider (when required to be identified in Part B, DME, and Part A Home Health claims) (A) has the current Medicare enrollment record and it contains a valid NPI/name match, and (B) is of a provider type that is eligible to order or refer for Medicare beneficiaries (see list above).
2. **Why did Medicare implement these edits?** These edits help protect Medicare beneficiaries and the integrity of the Medicare program.
There are also limitations providers should note:

- Chiropractors are not eligible to order or refer supplies or services for Medicare beneficiaries.
- Home Health Agency (HHA) services may only be ordered or referred by a Doctor of Medicine (M.D.), Doctor of Osteopathy (D.O.) or Doctor of Podiatric Medicine (DPM). Claims for HHA services ordered by any other specialty will be denied.
- Portable X-Ray services may only be ordered by a Doctor of Medicine or Doctor of Osteopathy. Portable X-ray services ordered by any other practitioner will be denied.

Types of service that require an ordering/referring provider NPI (this list is not all inclusive):

- Medicare covered services and items that are a result of physician orders
- Durable Medical Equipment
- Diagnostic Laboratory/Radiology
- Portable X-ray Services
- Specialty Pharmacy
- Parenteral and Enteral Nutrition
- Immunosuppressive Drug
- Physical Therapy, Occupational Therapy and Speech Language Pathology
- Consultative Services
- Hepatitis B claims
- Home Health

There are several CMS articles pertaining to the ordering/referring NPI requirements. For additional information, please refer to CMS’s MLN Matters site at [http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles](http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles).

- CR 6417 discusses background and who can refer/order.
- CR 6696 discusses ordering/referring providers who are not enrolled in Medicare.
- CR 7097 announces that physicians and non physicians need to enroll in Medicare to order/refer.
- CR 8097 discusses Speech, Physical & Occupation Therapies
- SE 1201 discusses Optometrists, Chiropractors, Home Health
- SE 1208 discusses the enrollment in Medicare to order/refer.

Please be diligent about including the ordering/referring NPI information on claim forms to prevent unnecessary claim delays.

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