

DATE: January 26, 2026

PPL NO. 26-001

TO: Local Educational Agency (LEA) Coordinators for the Local Educational Agency Medi-Cal Billing Option Program (LEA BOP)

SUBJECT: **PRACTITIONER ENROLLMENT IN MEDI-CAL**

PURPOSE: This Policy and Procedure Letter (PPL) notifies all LEAs participating in the LEA BOP of the requirement to enroll practitioners in Medi-Cal when an enrollment pathway exists.

REFERENCE: [Centers for Medicare and Medicaid Services \(CMS\) 2023 Guide, Section III \(G\).](#)

BACKGROUND:

Currently, the LEA BOP requires only those practitioners who order, refer, or prescribe to separately enroll in Medi-Cal because the LEA itself is already enrolled and is considered the furnishing provider. In 2023, CMS provided requirements that must be met for delivering services in school-based settings, including requiring practitioners who have an enrollment pathway to be separately enrolled in Medi-Cal regardless of whether the entity employing or contracting with them is also an enrolled provider.

Although there is more than one way for practitioners to enroll in Medi-Cal, the Department of Health Care Services (DHCS) recommends that practitioners enroll as Ordering, Referring, and Prescribing (ORP) providers, as this pathway is the simplest and most effective enrollment pathway that satisfies the federal requirement.

POLICY:

Effective July 1, 2026, all practitioners with a Medi-Cal enrollment pathway that provide LEA BOP covered direct services must separately enroll in Medi-Cal as a provider. Here is a list of practitioner types supported in Provider Application and Validation for Enrollment (PAVE): [Provider Types Supported in PAVE](#). Medi-Cal payment cannot be made for services and expenditures provided by practitioners who have a pathway to

enroll in Medi-Cal but have not enrolled. In addition, these practitioners will be removed from the Cost and Reimbursement Comparison Schedule. Practitioners will need to enroll through DHCS' [PAVE Portal](#). Practitioners without a pathway to enroll in Medi-Cal must be an employee or contractor of an enrolled Medi-Cal provider in order for the expenditures to be allowable. Therefore, the LEA will continue to be identified as the furnishing provider for those individual practitioners.

Implementation:

DHCS will provide LEAs with additional support via published guidance, including trainings, during the implementation process to ensure that LEAs can meet this requirement.

If you have any questions concerning this PPL, please contact the LEA BOP at LEA@dhcs.ca.gov.

Sincerely,

ORIGINAL SIGNED BY

Charles Anders, Division Chief
Local Governmental Financing Division
Department of Health Care Services