

Ordering, Referring, and Prescribing (ORP) Medi-Cal Provider Enrollment Town Hall #2

Department of Health Care Services
September 24, 2026



Accessibility Update Notice:

This slide deck has been updated to improve accessibility and usability. As a result, slide numbering may differ from the slide references cited during the recorded Town Hall presentation.

Agenda

- » Overview of Federal Regulations
- » Enforcement Approach
- » Planned Enforcement Timeline
- » Risk Mitigation Plans
- » Support and Resources
- » Questions/Answers

Overview of Federal Regulations and ORP: Background

- » DHCS is beginning a **multi-year, enterprise-wide effort** to fully implement and enforce federal provider requirements.
- » Enforcement will apply across all delivery systems.
 - Pharmacy (Medi-Cal Rx)
 - Medical (CA-MMIS for fee-for-service (FFS) claims)
 - Behavioral Health (Short-Doyle)
- » Federal Medicaid rules ([42 CFR 455.410](#) and [455.440](#)) require all ORP providers to be enrolled in Medicaid with a Type 1 (individual) National Provider Indicator (NPI).

Overview of Federal Regulations and ORP: Definitions

- » **Type 1 NPI (Individual):** For individual health care providers, such as physicians, nurse practitioners, pharmacists, and sole proprietors. Individuals are only eligible for one NPI.
- » **Type 2 NPI (Entity):** For health care organizations, such as hospitals, nursing homes, and physician groups not organized as a sole proprietor group. Organizations can have multiple NPIs.

Overview of Federal Regulations and ORP: Definitions (Continued)

» **Ordering Provider**

A licensed provider who directs specific services or supplies to be furnished to a Medi-Cal member. Some typically ordered services include, but are not limited to, laboratory tests, durable medical equipment (DME), and home health services (for example, a physician orders a lab test or DME item).

» **Referring Provider**

A licensed provider who sends a Medi-Cal member to another provider for services, typically evaluation or treatment that the referring provider cannot perform (for example, a primary care practitioner refers a Medi-Cal member to a gastroenterologist).

» **Prescribing Provider**

A licensed provider (e.g., a physician, nurse practitioner or pharmacist) who writes a prescription for a medication or other pharmacy-dispensed item within their scope of practice.

Enforcement Approach

- » Enforcement will be phased for claims submitted to CA-MMIS (medical) and Medi-Cal Rx (pharmacy).
- » Enforcement will begin in February 2027 and is currently planned for completion in Q2 2028.
- » Phases will be defined by claim type (medical; pharmacy; behavioral health).
- » Once enforcement is implemented, claims will deny if enrollment requirements are not met.

Planned Enforcement Timeline

Beginning	Claims System	ORP Type	Impacted Providers
Feb 2027	Medical	Ordering & Referring	Providers ordering DME and Clinical Labs. Providers referring for Long Term Care.
Mar 2027	Pharmacy	Prescribing	All Prescribing Providers except Physicians (MD;DO); Advanced Practice Clinicians (PA; NP); Pharmacists; Students/Residents; Dental Providers
Apr 2027	Medical	Ordering & Referring	Provider Types on Slide 8
Jul 2027	Pharmacy	Prescribing	All Prescribing Providers (no exclusions)
Oct 2027	Short-Doyle	Ordering, Referring & Prescribing	Select SMHS, DMC and DMC-ODS services that would require ORP
Feb 2028	Medical	Ordering & Referring	Provider Types on Slides 9 and 10

Enforcement = all claims have a **valid Type 1 (individual) NPI** from an **enrolled FFS provider**

April 2027 Enforcement – Ordering/Referring

- » CCS/GHPP institutional
- » Certified hospice
- » Chronic dialysis clinic
- » Dispensing opticians
- » Fabricating optical laboratory
- » Genetic disease testing
- » Group respiratory care practitioners
- » Hearing aid dispensers
- » Home and Community Based Services Nursing Facility
- » Home Health Agencies
- » Hospice - palliative care services
- » Mental health inpatient services
- » Nurse anesthetists
- » Occupational therapists
- » Orthotists
- » Personal Care Agency
- » Physical therapists
- » Podiatrists
- » Portable x-ray
- » Prosthetists
- » Qualified Autism Service Provider
- » Rehabilitation clinic
- » Residential Care Facilities for the Elderly (RCFE)
- » Respiratory care practitioner
- » Speech therapists
- » Surgical clinic

February 2028 Enforcement – Ordering/Referring

- » Audiologists
- » Care coordinator agencies (CCA)
- » CCS/GHPP non-institutional
- » Certified acupuncturist
- » Certified nurse midwife
- » Certified nurse practitioner
- » Chiropractors
- » Christian science practitioner
- » Clinic exempt from licensure (includes Justice Involved)
- » Clinical nurse specialist x-over provider only
- » Community based organizations
- » Community clinic
- » Community inpatient hospital
- » Community outpatient hospital
- » County clinics not associated with hospital
- » County hospital
- » County hospital outpatient
- » CYBHI fee schedule
- » Diabetes prevention program supplier
- » Doula group provider
- » Doula individual provider
- » Drug Medi-Cal
- » Employer employee clinic
- » Employment agency
- » EPSDT supplemental services provider
- » Every woman counts
- » Expanded access to primary care
- » FQHC/RHC APM providers
- » FQHC/RHC/THP FFS (Previously Development Screening and Trauma)
- » Free clinic
- » Ground medical transportation
- » Group certified nurse practitioner
- » Group optometrists
- » HCBC benefit provider
- » Health access program
- » Independent diagnostic testing facility XOVER prov only

February 2028 Enforcement – Ordering/Referring (cont.)

- » Indian health services/memorandum of agreement
- » LCSW group
- » LCSW individual
- » Licensed building contractors
- » Licensed midwives
- » Licensed professional clinical counselor – group
- » Licensed professional clinical counselor – individual
- » Local education agency
- » Local health jurisdictions
- » Marriage and family therapist group
- » Marriage and family therapist individual
- » Medicare crossover provider only
- » Multipurpose senior services program
- » Multispecialty clinic
- » Optometrists
- » Otherwise undesignated clinic
- » Outpatient heroin detox center
- » Physicians
- » Physicians group
- » Private non-profit proprietary agency
- » Professional corporation
- » Psychologists
- » RHC/FQHC
- » RVNS individual nurse providers
- » Tribal FQHC providers
- » Unified school district

Risk Mitigation Plans

- » Prior to each phased implementation:
 - Go/No-go readiness, including enrollment progress and call center capacity
 - 120-day intervals
- » Post each phased implementation:
 - Analysis of impact to members, providers, and call centers

Support and Resources

- » For enrollment policy questions, review the [ORP Enrollment](#) slide deck, or utilize the [Provider Inquiry Form](#).
- » Medi-Cal Provider Enrollment Help Desk
 - Phone (866) 252-1949
 - For more information, visit [Ordering/Referring/Prescribing Only Enrollment Information | DHCS](#)
- » For medical (CA-MMIS) questions, call the Telephone Service Center at (800) 541-5555 (outside of California, please call (916) 636-1980).
- » For additional questions, please email ORP@dhcs.ca.gov.

Questions?