

Frequently Asked Questions (FAQs) Referring, Ordering, Prescribing, Attending (ROPA) Providers

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Q1: [What types of providers are affected?](#)

A1: As required by the federal government, all medical providers (who are a registerable provider type) must be enrolled with the State Medicaid program in order for Medicaid to pay for services to which they attend, prescribe, order or refer. The rule applies even if the provider does not accept Medicaid payment for the provider's own services or wishes to otherwise participate as a Medicaid provider. See [Medical Policy Manual Chapter 601, Attachment A](#) for a list of registerable provider types.

Q2: [Which Medicaid programs are affected?](#)

A2: This rule applies to all AHCCCS programs regardless of managed care or fee-for-service delivery.

Q3: [What services are affected?](#)

A3: The provider should enroll before attending, ordering, prescribing, or referring services. The service must continue to be within the provider's scope of practice to attend, order, prescribe, or refer, and all other program rules for seeking coverage apply. Services affected by this new rule include, but are not limited to, home care services, lab testing, durable medical equipment, and prescription drugs.

EXAMPLE: If an AHCCCS member uses a Medicaid card at the pharmacy counter because she has fee-for-service prescription coverage, Medicaid will not pay for the prescriptions unless the provider who prescribed the drugs is an AHCCCS registered provider or is identified as a non-registerable provider type.

Q4: [As a rendering/service provider, how can I find out if my ROPA provider is registered with AHCCCS?](#)

A4: Rendering/service providers reporting applicable prescribing, ordering, referring, or attending providers on their claims submissions to all AHCCCS programs must verify that these providers have appropriate registration. If they are a registerable provider type, use the online [AHCCCS Provider Listing web page](#) to verify enrollment .

Q5: Can a provider retroactively enroll?

A5: Yes for all provider types listed except the new OR provider type (the new provider type is prescribing or ordering providers that will allow for use as a prescribing/ordering authority only) for which retroactive registration will be effective no earlier than 10/1/2020. AHCCCS will pay retroactive claims and encounters involving registered, eligible providers subject to timeliness rules.

Q6: How long does the enrollment process take?

A6: Provider enrollment applications are typically processed within an average of six (6) business days, but may take a maximum of 45 days from the date the application is received.

Q7: Does this affect practitioners who are actively enrolled in Medicaid?

A7: Providers who are already registered with AHCCCS and are attending, prescribing, ordering or referring do not need to re-enroll.

Q8: Are ROPA Providers mandated to accept Medicaid patients?

A8: No. All providers have the choice of whether or not to accept Medicaid patients.

Q9: Do attending providers need to register?

A9: Yes, attending providers should be registered if they are a registerable provider type.

Q10: Will ROPA providers be required to re-validate their registration?

A10: Yes, all providers, including ROPA providers, must re-validate their AHCCCS enrollment every four (4) years.

Q11: What if I'm a prescribing provider who is not an AHCCCS registerable provider type (i.e. Pharmacist, Naturopath who treats adults only, etc.)?

A11: AHCCCS has identified an alternative exception process for prescribing or ordering providers (who are not registerable provider types) that will allow for participation as a provider with referring, ordering, prescribing, or attending authority only.

Q12: How can I enroll as an ROPA Provider?

A12: Providers who:

- do not want to bill Medicaid for covered services, and
- only want to prescribe, order, attend, or make referrals for Medicaid recipients, and
- are a registerable provider type

can enroll with AHCCCS. New providers can enroll [here](#). Currently enrolled providers can login to [AHCCCS Online](#).

Q13: How should MCOs handle rejects at point of sale for pharmacies? Will there be exceptions for lifesaving prescriptions (such as inhalers) and hospital discharges?

A13: AHCCCS members are not financially responsible for any out of pocket expenses, with the exception of member copayments, for an emergency service or lifesaving prescription that is ordered and or rendered by a non AHCCCS registered provider. The financial responsibility will remain with the Managed Care

Organization if the member needs a lifesaving prescription and/or has an emergency. Emergency is defined in 42 C.F.R. 438.114. as a medical service provided for a non-FES member for the treatment of an emergency medical condition that manifests itself by acute symptoms of sufficient severity, including severe pain, such that a prudent layperson who possesses an average knowledge of health and medicine, could reasonably expect the absence of immediate medical attention to result in any of the following:

- Place the member's health in serious jeopardy,
- Serious impairment to bodily functions, or
- Serious dysfunction of any bodily organ or part.

Q14: If AHCCCS is the secondary insurance for a member, will all providers on their claim have to comply with the ROPA requirements by the deadline as well?

A14: Yes, the requirement applies whether AHCCCS is a member's primary or secondary insurance.

Q15: If I am a resident, intern or pharmacist and I don't see my NPI listed on the ROPA excepted Provider List, how do I get added to the list?

A15: If I am a resident, intern or pharmacist and I don't see my NPI listed on the ROPA excepted Provider List, how do I get added to the list?

To have missing residents, interns or pharmacists added to the ROPA excepted Provider List, please email the following information to the address listed below:

- NPI,
- Provider Name,
- Indication of whether the NPI is associated with a resident, an intern or a pharmacist,+ and
- Beginning date associated with this association.

Email: ROPAXceptions@azahcccs.gov