

Ordering, Referring, Prescribing (ORP), and Attending Provider Enrollment

Compliance Requirements

04/21/2026 – 9:00 a.m.



DEPARTMENT OF
**PUBLIC HEALTH &
HUMAN SERVICES**

Agenda

Provider Roles Overview

Provider Enrollment Requirements

Montana Healthcare Programs Claims System

Preparing for the New System

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Provider Roles Overview



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Treating Provider (Rendering / Attending)

- Definition: The treating provider is the provider who delivers the service (rendering) or supervises care during an encounter (attending).
- Billing Requirements:
 - Must use Individual (Type 1) NPI.
 - On UB-04 claims for professional services, the “Rendering” provider is reported in the Attending Provider field.
 - The treating provider must be enrolled with Montana Healthcare Programs, including the separate Healthy Montana Kids (HMK/CHIP) enrollment through Blue Cross Blue Shield of Montana, when applicable, or claims will be denied.



ORP Provider (Ordering, Referring, Prescribing)

- Definition: A licensed provider who authorizes services such as lab tests, imaging, durable medical equipment, referrals, or medications.
 - ORP providers do not perform the service.
 - A provider can be an ORP-only and never bill Montana Healthcare Programs directly.
- Billing Requirements:
 - Must use Individual (Type 1) NPI.
 - On UB-04 claims, ORP NPI is entered into Field 78.
 - ORP provider must be enrolled with Montana Healthcare Programs, including the separate Healthy Montana Kids (HMK/CHIP) enrollment through Blue Cross Blue Shield of Montana, when applicable, or claims will be denied.



Provider Enrollment Requirements



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Federal Regulations (42 CFR § 455.410)

- Federal regulation requires all providers who order, refer, prescribe (ORP), render, or attend services for Montana Healthcare Program members to be enrolled.
- This applies to treating providers and ORP providers, even if they do not personally accept Medicaid or submit claims for payment.
- This regulation is intended to improve program integrity and reduce fraud, waste, and abuse.



Montana Healthcare Programs Claims System



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New Claims System – Coming 2027

- Montana Healthcare Programs is implementing a new Montana Healthcare Claims System (MTHCS) in 2027.
- MTHCS will strictly enforce provider enrollment requirements.
 - An attending provider NPI will be required on UB-04 claims.
 - Claims for services that were ordered, referred, or prescribed must include the ORP provider's NPI.
 - A claim can have both a treating provider and an ORP.
 - If either the treating provider or ORP provider is not enrolled, the claim will be denied.



Why ORP Enrollment Matters

- Claims with a non-enrolled ORP provider will fail claim validation, even if the treating provider is enrolled.
- As the Pay-To provider, you are responsible for ensuring every individual provider listed on a claim is actively enrolled.
- ORP providers may not work for you, but their enrollment status will still affect your claim payment.



Preparing for the New System



Provider Enrollment Next Steps

- Verify all your treating (rendering/attending) providers are enrolled with Montana Healthcare Programs, including the separate Healthy Montana Kids (HMK/CHIP) enrollment through Blue Cross Blue Shield of Montana, when applicable.
- Establish a process to confirm ORP providers are enrolled before services are billed.
- Ensure your billing system always sends the treating provider information.
- Ensure your billing system can submit ORP provider information when applicable.
- Begin enrollment now for any provider who is not actively enrolled.



Enrollment Path – Rendering Provider

- Enrollment path for a treating provider (rendering/attending) who provides direct patient care while working for an organization.
- Does not receive direct payments from Montana Healthcare Programs.
- Does not require banking information.
- Does not enroll under a Tax ID and can practice at multiple locations.
- Must be affiliated with the billing provider.



Enrollment Path – ORP Provider

- Enrollment path for a provider who only writes orders, prescribes medications, or refers members for services from other providers.
- Does not bill Montana Healthcare Programs for services.
- Does not require banking information.
- Does not require affiliation with an enrolled provider.



Presentation Summary



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High-Level Summary

- All treating and ORP providers must be enrolled with Montana Healthcare Programs (and HMK/CHIP when applicable).
- Treating = provides direct care; ORP = orders, refers, prescribes; both have Type 1 NPIs.
- MTHCS will deny claims if either the treating or ORP provider is not enrolled.
- Attending NPI and ORP NPI must appear on UB-04 when applicable.
- Pay-To providers must verify enrollment of all NPIs on every claim.
- Begin enrollment now and ensure billing systems send treating and ORP NPIs correctly.



Post Training Questions and Comments

Question	Answer
If a provider is enrolled as an ORP with Medicare do they need to enroll as an ORP with Montana Healthcare Programs?	Yes. The Medicare enrollment does not transfer to Montana Healthcare Programs.
Does the remittance advice include a reason & remark code when an attending provider is not enrolled?	Not currently. We are exploring if we can begin posting a reason & remark code on claims where the attending provider is not enrolled.
Can enrollment applications be sent in via paper?	No. All enrollment applications must be submitted through the Provider Services Portal.



Resources and Other Additional Information



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Important Websites

- Montana Healthcare Programs Provider Enrollment Webpage
 - <https://medicaidprovider.mt.gov/providerenrollment>
- Provider Services Portal
 - [Montana Provider Services Portal \(MES Integrated Customer Access Portal \(ICAP\)\)](#)
- Claims Modernization Information
 - <https://dphhs.mt.gov/MontanaHealthcarePrograms/ClaimsModernization>



Relevant Trainings and Notices

- September 2025 ORP Training Presentation
 - <https://medicaidprovider.mt.gov/docs/training/2025training/2025ORPTrainingMaster.pdf>
- March 2026 Monthly Provider Enrollment Training Presentation
 - <https://medicaidprovider.mt.gov/docs/training/2026/March2026MonthlyEnrollmentTraining.pdf>
- Provider Affiliations Provider Notice
 - [Affiliations Requirements in the Claims Modernization System](#)



Provider Enrollment Contact Information

- Provider Relations
 - Phone: (800) 624-3958; Select Option 7 then Option 4
- HMK/CHIP Provider Enrollment Contact Information
 - Email: hcsx6100@bcbsmt.com

