Referring, Ordering, Prescribing and Attending (ROPA)
Provider Billing Requirements for Pharmacy Transactions

The Agency for Health Care Administration (Agency), DXC Technology (DXC) and Magellan Medicaid Administration are implementing the Referring, Ordering, Prescribing, and Attending (ROPA) Provider Enrollment Initiative in order to meet requirements detailed in the Patient Protection and Affordable Care Act (ACA). The initiative requires all providers who refer, order, prescribe, or attend in conjunction with the provision of services to Florida Medicaid recipients to be known to the Florida Medicaid program.

To summarize, the following are required:

- Requires providers who refer, order, prescribe, or attend to be actively enrolled in the Medicaid program
- Requires the National Provider Identifier (NPI) of any ordering or referring physician, or other professional, to be submitted on any claim for payment (this applies to both FFS and encounters)

Pharmacy Transaction Submission Guidelines
The following fields will be updated in the Florida D.0 Payer Specification to reflect the only value permissible by ROPA requirements:

- Prescriber ID Qualifier Field (466-EZ)
  - 01-National Provider Identifier (NPI)
- Prescriber ID Field (411-DB)
  - NPI

The Agency will notify pharmacy providers when all claims and encounters will deny for ROPA requirements.

Effective March 2, 2020, pharmacies must comply with the above Florida D.0 Payer Specifications for FFS claims when the prescriber has an active NPI known to Florida Medicaid. Active NPI means the prescriber is currently enrolled with Florida Medicaid. The Florida Department of Health (DOH) license number is no longer accepted for prescribers with an active NPI.
Pharmacies can expect to receive NCPDP error code 25 – Missing/Invalid Prescriber ID at the Point of Sale (POS) when a FFS claim is submitted that contains the Florida DOH license number for a prescriber with an active NPI. The following supplemental message will post with NCPDP error code 25: Submit prescriber NPI. If unable to obtain NPI, submit SCC = 42 to override error. Pharmacies that cannot timely verify and submit prescriber NPI at the POS may submit Submission Clarification Code (SCC) 42 to temporarily override the error. Pharmacies that submit SCC 42 will override the NCPDP error code 25 and allow the claim to process with the prescriber’s Florida DOH license number. SCC 42 will not override additional errors that may post on the claim for reasons other than prescriber ID.

The Agency will notify pharmacies when SCC 42 is no longer available to override NCPDP error code 25 at the POS.

Pharmacies may continue to submit FFS claims that contain the Florida DOH license number for prescribers not currently enrolled with Florida Medicaid, until ROPA requirements are enforced by the Agency.

For questions concerning Pharmacy claim specifications please contact the Magellan Encounter Technical Data Specialists at: FLMCOSupport@magellanhealth.com