



## REFERRING, ORDERING, PRESCRIBING, ATTENDING (ROPA) UPDATE

February 18, 2022

Dear Care1st Providers and Billing Staff:

The [Patient Protection and Affordable Care Act \(ACA\)](#) and the [21st Century Cures Act \(Cures\)](#) require that all health care providers who **refer** AHCCCS members for an item or service, who **order** non-physician services for members, who **prescribe** medications to members, and who **attend**/certify medical necessity for services and/or who take primary responsibility for members' medical care must be registered as AHCCCS providers. AHCCCS calls this initiative, and these providers, "ROPA."

Until these acts passed, referring, ordering, prescribing, and attending providers were required to obtain and maintain a National Provider Identifier (NPI), but were not required to be registered as an AHCCCS provider. *With the implementation of ROPA requirements any registrable healthcare provider who is not already registered as an active AHCCCS provider must register or be identified as an Exception non-registrable provider\**, if applicable.

To make the ROPA registration process as simple as possible, AHCCCS will develop a streamlined application for ROPA providers who meet all of the following criteria:

- Have a National Provider Identifier (NPI) from the National Plan and Provider Enumeration System (NPPES),
- Already fully enrolled in Medicare or another state's Medicaid program, and
- Do not intend to bill AHCCCS for services.

The streamlined registration application is expected to be available in late 2022. Following that implementation, claims that originate from an un-registered ROPA provider will not be reimbursed.

\*There are limited types of providers who can refer, order, prescribe or attend who are not registrable provider types with AHCCCS, including pharmacists, residents, and interns. The providers in the following list will not be required to formally register with AHCCCS but will be tracked for validity through an alternative tracking system.

### ROPA Provider Listings

All health care providers who **refer** AHCCCS members for an item or service, who **order** non-physician services for members, who **prescribe** medications to members, and who **attend**/certify medical necessity for services and/or who take primary responsibility for members' medical care must be registered as AHCCCS providers or be listed as an allowed not registered Exception provider.

In support of validation that a health care provider meets these requirements, AHCCCS publishes on their ROPA webpage, <https://www.azahcccs.gov/PlansProviders/NewProviders/ROPA.html>, two listings as follows on a regular basis:

1. AHCCCS Active, Registered Providers by NPI who may refer, Order, Prescribe or Attend
2. ROPA Excepted Providers List (Resident, Interns, Pharmacists)

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### Care1st Network Management

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Visit our website at [www.care1staz.com](http://www.care1staz.com)

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AHCCCS expects to begin enforcement, i.e., denials and rejections, on claim and encounter submissions soon after the end of the Public Health Emergency (PHE), which currently is scheduled for mid-April 2022. It is likely the ROPA effective enforcement date will be 60 days after the PHE ends. All Medicaid plans are required to follow the regulation.

**Additional Resources:**

1. Visit the AHCCCS Referring, Ordering, Prescribing, Attending (ROPA) landing page for more information: <https://www.azahcccs.gov/PlansProviders/NewProviders/ROPA.html>
2. AHCCCS ROPA Flier: "Don't Be The Weak Link in the Claim"  
[https://www.azahcccs.gov/PlansProviders/Downloads/ROPA/20079\\_ROPA\\_flier.pdf](https://www.azahcccs.gov/PlansProviders/Downloads/ROPA/20079_ROPA_flier.pdf)
3. Register with AHCCCS through the AHCCCS Provider Enrollment Portal:  
<https://www.azahcccs.gov/PlansProviders/APEP/ProviderEnrollment.html>

If you have questions or need assistance, please contact Care1st Network Management using the information below.

**Thank You!**

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