

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**Department of Health Care Finance**



Office of the Senior Deputy Director/Medicaid Director

**Transmittal #21-36**

**TO:** District of Columbia Institutional Fee-For-Service Providers

**FROM:** Melisa Byrd  
Senior Deputy Director/State Medicaid Director

**DATE:** September 08, 2021

**SUBJECT:** Attending Provider Enrollment and NPI Requirements for Institutional Claims

---

**Purpose**

The purpose of this transmittal is to inform institutional providers that, as a condition of Medicaid reimbursement, claims (both those submitted electronically and by paper) must contain the NPI of the attending provider and the attending provider must be enrolled in Medicaid.

**Institutional Claims**

Effective thirty (30) days from the date of this transmittal, the Department of Health Care Finance (DHCF) requires that all institutional claims, whether submitted electronically or by paper, contain the National Provider Identifier (NPI) of an attending physician who is enrolled and in active status as a D.C. Medicaid provider, as of the applicable date of service. This requirement supplements DHCF Transmittal #19-07, which required the NPI of an enrolled attending physician on claims submitted electronically only.

Under 42 C.F.R. § 455.410(b), ordering, referring, and prescribing (ORP) providers are required to “be enrolled as participating providers” with the state Medicaid agency in order for there ordered, referred, and prescribed services to be billable to Medicaid. The Centers for Medicare and Medicaid Services (CMS) interprets this enrollment requirement to include attending physicians supervising care in institutional settings. For such services, the attending physician serves as the ORP provider, and must be enrolled as a D.C. Medicaid provider in order for the subject service to be reimbursed by DHCF.

DHCF will deny claims with dates of service on or after thirty (30) days from the date of this transmittal.

**Contact**

If you have any questions related to this requirement, please contact Donald Shearer, Director of the DHCF Healthcare Operations Administration at [Donald.shearer@dc.gov](mailto:Donald.shearer@dc.gov).

cc: Medical Society of the District of Columbia

DC Hospital Association  
DC Primary Care Association  
DC Health Care Association  
DC Home Care Association  
DC Behavioral Health Association  
DC Coalition of Disability Service Providers