

Frequently Asked Questions

Re: [Six-Month Pause on New Enrollments of Select Provider Types](#)

1. We are working with a few providers with surveys scheduled in the next few months. Will they be able to submit an agreement to cooperate and a state license and just not enroll in ePrep?

- A. To avoid reduplication of effort, BHA will not be reviewing new applications from any providers who currently bill Medicaid or will bill Medicaid. Any application for a provider that does not fall into one of the exception categories identified in the press release will have their application returned if it was not received by 11:59p on June 30, 2024.

2. Is licensing planned to open again in January? Other providers are interested in starting the process this fall, but we don't want them to schedule surveys if licensing won't open back up in January. Carf takes a few months to schedule.

- A. MDH is conducting a thorough evaluation of the licensing and accreditation process to ensure patients receive the highest quality of care. While this process is anticipated to take six months, it is possible that the moratorium could be extended.

3. Are existing providers able to expand and add locations during this time?

- A. No, the pause in the licensing of new PRP-Adults, PRP-Minors, PRP-Health Homes, SUD-IOP(Level 2.1), and SUD-PHP-(Level 2.5) will include existing providers enrolled as a Medicaid participating provider who are seeking to expand their service licensure.

4. Are licenses being processed during this period and Medicaid enrollment is just not being processed? IOP and PHP can be done via private pay and commercial insurance, so just wanted to clarify if the licenses are being paused or just Medicaid enrollment.

- A. New provider licenses and existing provider services expansions will not be issued for any provider who will bill Medical Assistance during the 6 month pause.
- B. Providers who are not currently Medicaid providers and who will not enroll as a Medicaid provider may submit applications, but due to the volume of applications already received in calendar year 2024 and the verification process being used to prevent further fraud, waste, and abuse, providers should be aware that there will be a significant wait for approval.

5. If an existing provider is adding a new location does the fall under the pause?

- A. Yes. existing providers adding services will fall under the pause.

6. Are there exceptions to the pause for providers who have already secured accreditation, office space for IOP & PHP but have not submitted their application?

- A. There is no exception at this time if a potential provider has received accreditation but did not submit an application by 11:59p on June 30, 2024.

7. Does the pause affect Medicaid and Medicare only?

- A. While providers who will only accept commercial insurance or self-pay can continue to submit applications for licensure, the lengthy verification and quality control procedures that have been put in place to address the underlying issues affecting all providers will result in significant delays in the licensing process.

8. Would new applications for other insurance programs and/or self pay still be considered?

- A. Only if the provider is not going to bill Medicaid at any point. All providers submitting an application are expected to submit an attestation that indicates that the provider does not ever intend to bill Medicaid. Please note that while applications for these providers will be accepted and reviewed, potential providers should anticipate significant delays in the application review and potential approval.

9. In regards to the pasted copy of your [press release](#), can you please clarify if the six month pause on license submission pertains ONLY to applicants pursuing Medicaid enrollments, or does this pertain to ALL new programs to include both ASAM levels 2.1 and 2.5?

- A. See question 7 & 8.

10. Can the same exemption as the mergers and acquisitions be applied to providers who are already in the process of opening?

- A. No, new provider licenses and existing provider service expansions will not be issued during the 6 month pause even if the provider has already started the accreditation process.

11. Will LBHA/CSA/LAA continue to sign agreements to cooperate with new providers?

- A. LBHA/CSA/LAA will continue to sign agreements to cooperate with providers that are
 - a. Renewing an existing license
 - b. Relocating their existing program to another brick and mortar location
 - c. If a provider requires a modification to an existing license due to a merger or acquisition
 - d. If a license is being issued as a result of a requirement for local, state, or federal grant funding.
- B. LBHA/CSA/LAAs may continue to review all other agreements to cooperate at their discretion.

12. Does this pause affect only programs under Medicare/Medicaid? Or would it affect all types of private insurance and/self-pay situations? In other words, if we started a new license without Medicare/Medicaid reimbursement and accepting other insurance

plans/self-pay options, would we still be able to file a new application for a PHP + IOP program?

- A. Existing providers who are enrolled as Medicaid providers will not be able to apply for a new license, even if the provider does not intend to bill Medicaid from the new license.
- B. New applicants who will not bill Medicaid may submit applications, but should expect significant delays in the approval process due to the lengthy verification and quality control procedures that have been put in place to address the underlying issues affecting all providers.

13. It states that applications submitted prior to July 1, 2024 will be reviewed as normal. Does this mean the licensing applications OR the Medicaid enrollment applications?

Both

- A. Medicaid will proceed with reviewing the enrollment applications submitted prior to 7/1/24. BHA will process licensing applications submitted prior to 7/1/2024.