

Provider Notice

To: Substance Use Opioid Treatment Programs
From: Dan Eisenhauer, Director of Operations
Date: September 8, 2021
Subject: SU 21 102: Opioid Treatment Program Services for Dually Eligible Individuals

OMHSAS issued bulletin OMHSAS -21-06 effective August 16, 2021 notifying OTP providers that “because Medicare now covers OTP services and Medicaid is the payor of last resort, the MA Program will pay secondary to Medicare for OTP services provided on or after August 16, 2021, to dually eligible individuals.”

The bulletin applies to OTPs certified per 42 C.F.R part 8, which requires that OTPs be certified by the Substance Abuse and Mental Health Services Administration (SAMHSA) and accredited by an independent, SAMHSA-approved accrediting body. 28 Pa. Code Section 715.3 also requires that OTPs be licensed as a D&A OP Clinic by the Department of Drug and Alcohol Programs.

OMHSAS-21-06 also included instructions on how to become enrolled in Medicare as a provider. Instructions to enroll in Medicare are contained in the *OTP Medicare Enrollment Fact Sheet* available at: <https://www.cms.gov/Outreach-and-Education/Medicare-LearningNetwork-MLN/MLNProducts/Downloads/OTP-enrollment-factsheet-MLN6325432.pdf>. OMHSAS 21-06 also notified providers that “newly Medicare-enrolled OTP providers can get a retrospective billing date for up to 30 days prior to the effective date of their Medicare enrollment. The Informational Bulletin can be referenced at this link: <https://www.medicaid.gov/federal-policy-guidance/downloads/cib121719.pdf>. OTP providers will need to enroll in Medicare no later than September 14, 2021.”

PerformCare requires all OTP providers to enroll with Medicare and to bill Medicare as primary. PerformCare will deny claims, with a service dates starting on 10/8/2021 for dual eligible members for services provided by OTP providers when there is no EOB or the EOB allowed amount is zero.

If you have any questions about this notice, please contact your Account Executive.

cc: Lisa Hanzel, PerformCare
Scott Suhring, Capital Area Behavioral Health Collaborative
PerformCare Account Executives