



Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Robert R. Neall, Secretary

**MARYLAND MEDICAL ASSISTANCE PROGRAM**  
**Substance Use Disorder Transmittal No. 28**  
**June 1, 2020**

TO: Opioid Treatment Program Providers

FROM: Jill Spector, Director  
 Medical Benefits Management

Aliya Jones, M.D.  
 Deputy Secretary, Behavioral Health Administration

RE: Medicare Coverage of Opioid Treatment Centers

**NOTE: Please ensure that appropriate staff members in your organization are informed of the contents of this transmittal**

Beginning January 1, 2020, the Centers for Medicare and Medicaid Services (CMS) allowed Medicare to reimburse Medicare enrolled Opioid Treatment Programs (OTPs) to deliver opioid use disorder treatment services to Medicare beneficiaries. CMS is accepting and processing OTP enrollment applications. The Maryland Department of Health (MDH) strongly encourages providers to enroll with Medicare to ensure continuity of care for dually eligible beneficiaries. Since Medicare is now the primary payer for these services delivered to Medicare enrollees, providers need to make the following changes to ensure reimbursement:

**Newly Enrolled Medicare Providers**

During this transition period, claims submitted to Medicaid during the enrollment period for Medicare will be recouped from the provider once they are able to submit claims to Medicare; therefore for dates of service on or after July 1, 2020, the Behavioral Health Administrative Service Organization (ASO) will deny OTP claims for Medicare enrolled beneficiaries. Medicare enrolled OTPs must submit claims directly to Medicare and may not submit claims to Medicaid for dually eligible beneficiaries.

As of July 1, 2020, in order to receive payment for these Medicare enrolled beneficiaries, providers must be enrolled with and bill Medicare as primary payer. OTP providers who are not enrolled with Medicare will not be eligible to receive Medicaid coinsurance payments for services rendered to Medicare eligible beneficiaries. This includes the “SLMB/QMB” or dually eligible populations.

### **Providers Pending Medicare Enrollment**

CMS permits providers who enroll as a Medicare provider to submit claims for dates of service up to 30 days prior to their enrollment effective date. To minimize the disruption of services while awaiting Medicare enrollment, providers may continue to submit their OTP claims to the ASO through June 30, 2020. Providers will need to track these claims and void them once the claims have been submitted to Medicare. Additionally, Medicaid will reconcile claims quarterly to ensure that providers are not paid under both Medicaid and Medicare.

### **Providers Not Enrolling With Medicare**

Providers who do not enroll with Medicare are responsible for transferring their patients to a Medicare enrolled OTP and have an obligation to support their patient clinically through the transition process as this policy takes effect July 1, 2020. Claims submitted for Medicare enrolled beneficiaries will not be eligible for reimbursement after June 30, 2020.

You may contact [mdh.mabehavioralhealth@maryland.gov](mailto:mdh.mabehavioralhealth@maryland.gov) for questions regarding this change.

### **Medicare Coverage of OTP Resources:**

Information regarding Medicare enrollment can be found at:

<https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/Opioid-Treatment-Program/Enrollment>

Information regarding Medicare billing and payment can be found at:

<https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/Opioid-Treatment-Program/billing-payment>

Frequently Asked Questions for Medicare coverage of OTP services can be found at:

<https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/Opioid-Treatment-Program/OTP-FAQs>

You may contact Medicare regarding specific questions for billing and claims by logging in to [MyMedicare.gov](https://www.medicare.gov) or calling 1-800-MEDICARE (1-800-633-4227).