



TO: All Providers

RE: Service Location Requirements for Providers Serving Residents of Nursing Facilities or Long-Term Care (LTC) Facilities

The Connecticut Department of Social Services (DSS) reminds providers that service locations used for Connecticut Medicaid enrollment **may not be located within a nursing facility**.

Providers who furnish services to Medicaid members residing in nursing facilities must maintain a **separate, independent service location** outside of the nursing facility where Connecticut Medicaid members can physically leave the nursing facility and be seen within this separate independent service location. This location serves as the provider's enrolled practice location and must comply with all applicable federal and state Medicaid enrollment requirements.

Why is this required?

Federal Medicaid law guarantees beneficiaries the right to receive covered services from any qualified provider willing to furnish those services (Section 1902(a)(23) of the Social Security Act; 42 CFR § 431.51). Maintaining an independent service location outside of a nursing facility helps preserve this freedom of choice by clearly distinguishing independent Medicaid providers from the nursing facility and ensuring that residents are able to select among qualified providers without the appearance that services are limited to or controlled by the facility.

Maintaining an independent enrolled service location also:

- Preserves the independence of enrolled Medicaid providers from the nursing facility.

- Clearly distinguishes the operations and responsibilities of the nursing facility from those of the individual provider.
- Supports accurate provider enrollment, billing, and program integrity.
- Promotes transparency, accountability, and appropriate oversight of services furnished to Connecticut Medicaid members.
- Reinforces that Connecticut Medicaid members residing in nursing facilities retain the right to choose any qualified Connecticut Medicaid provider willing to furnish covered services.

Provider Responsibilities

Providers who furnish services to Connecticut Medicaid members residing in nursing facilities must:

- Maintain an enrolled service location that is **not** physically located within a nursing facility.
- Continue to travel to nursing facilities, when appropriate, to provide covered services to Connecticut Medicaid members.
- Ensure that all provider enrollment information maintained with DSS accurately reflects the provider's independent service location.

Providers whose current Connecticut Medicaid enrollment lists a nursing facility as their service location should submit an update to their enrollment record to reflect a compliant practice location.

Failure to maintain an appropriate enrolled

service location may affect a provider's compliance with Connecticut Medicaid enrollment requirements.

Questions regarding provider enrollment or updating a service location should be directed to CT DSS Medicaid Enrollment michael.flynn@ct.gov or DSS QA Nicole.Sinisgalli@ct.gov