

IHCP *bulletin*

INDIANA HEALTH COVERAGE PROGRAMS BT202667 MAY 7, 2026

IHCP seeks approval for an ABA provider enrollment moratorium

The Indiana Health Coverage Programs (IHCP) is seeking approval from the Centers for Medicare & Medicaid Services (CMS) to implement a statewide provider enrollment moratorium on applied behavior analysis (ABA) providers.

Under *Code of Federal Regulations 42 CFR 455.470*, a state Medicaid agency can impose a temporary moratorium on the enrollment of new providers that the agency identifies as having a significant risk for fraud, waste or abuse, and that the Secretary of the U.S. Department of Health and Human Services (HHS) has identified as being at high risk for fraud, waste or abuse.

The proposed effective date for the moratorium is June 6, 2026. Upon approval, this moratorium will be in place for an initial period of six months. The IHCP may continue to extend the moratorium in six-month increments.

The moratorium will prevent enrollment for brand new ABA therapy group enrollments as well as changes of ownership for existing ABA therapy agencies. The moratorium will not apply to the following:

- Any enrollment application received prior to the moratorium imposition date
- Rendering provider enrollment request for an individual providing ABA therapy services

The IHCP will consider limited exceptions to the moratorium to ensure sufficient member access to ABA therapy services to areas in need. Provider agencies seeking an exception to the moratorium must be accredited per the requirements described in *IHCP Bulletin BT202646*.

Providers may submit their request for an exception to OMPPProviderRelations@fssa.in.gov.



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