



May 12, 2025 for Immediate Release Compliance Bulletin – Proposed Legislation

The Majority Memorandum for May 13, 2025, Committee on Energy and Commerce Markup was released late last evening. This document, including a number of repeal and rescind orders, but also added additional screening requirements for Medicaid.

Section 44105 requires States to conduct monthly checks to determine whether HHS or another state has already terminated a provider or supplier from participating in Medicaid and to also disenroll them from the state's Medicaid program.

- **Our Preliminary View** – Since not all states have a sanctioned provider database this may result in an increase in the number of states with such exclusion databases. In addition, this may result in Managed Medicaid contractors and States bolstering their compliance related expectations.

Section 44106 requires state Medicaid programs check, as part of the provider enrollment and re-enrollment process and on a quarterly basis thereafter, the Social Security Administrations Death Master File to determine whether providers are deceased and enrolled in the state's Medicaid program.

- *Our Preliminary View* – *We expect States to increase their compliance enforcement and expectation that hospitals and physician practice operations screen quarterly the death master file.*

Compliance Guidance

The Taiga Group suggests that all clients evaluate their current process for Death Master screening and if not currently performed quarterly or annually a recredentialing consider doing so. Taiga Check™ can assist with this assurance testing for those not already subscribed.

We also suggest that all clients review their current Taiga Check™ subscription database and considering broadening State Medicaid exclusion assurance subscriptions if you participate in out of state Medicaid or have providers that work both within your State and within another state. Existing Locum Tenens agreements should also be reviewed for compliance.





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