

Table of Contents

State/Territory Name: Iowa

State Plan Amendment (SPA) #: 25-0034

This file contains the following documents in the order listed:

- 1) Approval Letter
- 2) CMS 179 Form/Summary Form (with 179-like data)
- 3) Approved SPA Pages

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
601 E. 12th St., Room 355
Kansas City, Missouri 64106



Medicaid and CHIP Operations Group

March 18, 2026

Lee Grossman
Medicaid Director
Iowa Department of Human Services
1305 East Walnut Street
Des Moines, IA 50319

Re: Iowa State Plan Amendment (SPA) 25-0034

Dear Iowa Medicaid Director Grossman:

The Centers for Medicare & Medicaid Services (CMS) reviewed your Medicaid State Plan Amendment (SPA) submitted under transmittal number (TN) 25-0034. This amendment proposes to remove the end date for coverage of Medication Assisted Treatment services in accordance with Section 201 of the Consolidated Appropriations Act of 2024.

We conducted our review of your submittal according to statutory requirements in Section 1905(a)(29) of the Social Security Act. This letter informs you that Iowa's Medicaid SPA TN IA-25-0034 was approved on March 18, 2026, with an effective date of October 1, 2025.

Enclosed are copies of Form CMS-179 and approved SPA pages to be incorporated into the Iowa's State Plan.

If you have any additional questions or need further assistance, please contact Lee Herko at (570) 230-4048 or via email at Lee.Herko@cms.hhs.gov.

Sincerely,

Nicole McKnight
On Behalf of Courtney Miller, MCOG Director

Enclosures

cc: Jennifer Steenblock

**TRANSMITTAL AND NOTICE OF APPROVAL OF
STATE PLAN MATERIAL
FOR: CENTERS FOR MEDICARE & MEDICAID SERVICES**

1. TRANSMITTAL NUMBER

2 5 — 0 0 3 4

2. STATE

IA

3. PROGRAM IDENTIFICATION: TITLE OF THE SOCIAL SECURITY ACT

XIX XXI

TO: CENTER DIRECTOR
CENTERS FOR MEDICAID & CHIP SERVICES
DEPARTMENT OF HEALTH AND HUMAN SERVICES

4. PROPOSED EFFECTIVE DATE

10/1/2025

5. FEDERAL STATUTE/REGULATION CITATION
1905(a)(29) of the Act

6. FEDERAL BUDGET IMPACT (Amounts in WHOLE dollars)

a. FFY 25 \$ 0
b. FFY 26 \$ 0

7. PAGE NUMBER OF THE PLAN SECTION OR ATTACHMENT

~~Attachment 3.1-B Page 17~~
~~Supplement 2 to Attachment 3.1-A Page 36b~~

Attachment 3.1-B Pg
16-24b

Supplement to ²
Attachment 3.1A pg
~~36b-36k~~ 36a - 36j

Attachment 3.1-A 18a

8. PAGE NUMBER OF THE SUPERSEDED PLAN SECTION OR ATTACHMENT (If Applicable)

~~Supersedes Attachment 3.1-B Page 17 and
Supplement 2 to Attachment 3.1-A Page 36b~~

TN: 21-0006

Supersedes
Attachment 3.1B Pg
16-24

Supersedes
Supplement 2 to 3.1A
pg 36a-36i

9. SUBJECT OF AMENDMENT

Section 201 of the Consolidated Appropriations Act, 2024 made the MAT/ODD benefit at 1905(a)(29) permanent.

10. GOVERNOR'S REVIEW (Check One)

- GOVERNOR'S OFFICE REPORTED NO COMMENT
 COMMENTS OF GOVERNOR'S OFFICE ENCLOSED
 NO REPLY RECEIVED WITHIN 45 DAYS OF SUBMITTAL

OTHER, AS SPECIFIED:

11. SIGNATURE OF STATE AGENCY OFFICIAL

12. TYPED NAME
Rebecca Curtiss

13. TITLE
Medicaid Deputy Director of Operations

14. DATE SUBMITTED
12/17/2025

15. RETURN TO
Iowa Department of Health and Human Services
Iowa Medicaid
Lucas State Office Building
321 East 12th Street, Des Moines, IA 50319-1002

FOR CMS USE ONLY

16. DATE RECEIVED
December 29, 2025

17. DATE APPROVED
March 18, 2026

PLAN APPROVED - ONE COPY ATTACHED

18. EFFECTIVE DATE OF APPROVED MATERIAL
October 1, 2025

19. SIGNATURE OF APPROVING OFFICIAL

20. TYPED NAME OF APPROVING OFFICIAL
Nicole McKnight

21. TITLE OF APPROVING OFFICIAL
On Behalf of Courtney Miller, MCOG Director

22. REMARKS
Pen and ink change request approved by State on 3/12/2026 to update Box 7 to reflect Supplement 2 to Attachment 3.1-A, pages 36a-36j and Box 8 to add TN for the superseded pages (TN: 21-0006)

State Plan under Title XIX of the Social Security Act
State/Territory: Iowa

Section 1905(a)(29) Medication Assisted Treatment (MAT)

Citation: 3.1-A Amount, Duration, and Scope of Services

[Please check the box below to indicate if this benefit is provided for the categorically needy (3.1-A) or medically needy only (3.1-B)]

1905(a)(29) MAT as described and limited in _Supplement 2___ to Attachment 3.1-A.

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TN: IA-25-0034
Supersedes TN: NEW

Approval Date: 3/18/2026
Effective Date: 10/1/2025

**State Plan under Title XIX of the Social Security Act
State/Territory: Iowa**

Section 1905(a)(29) Medication Assisted Treatment (MAT)

General Assurances

[Select all three checkboxes below.]

MAT is covered under the Medicaid state plan for all Medicaid beneficiaries who meet the medical necessity criteria for receipt of the service for the period beginning October 1, 2020.

The state assures coverage of Naltrexone, Buprenorphine, and Methadone and all of the forms of these drugs for MAT that are approved under section 505 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 355) and all biological products licensed under section 351 of the Public Health Service Act (42 U.S.C. 262).

The state assures that Methadone for MAT is provided by Opioid Treatment Programs that meet the requirements in 42 C.F.R. Part 8.

Service Package

The state covers the following counseling services and behavioral health therapies as part of MAT: **[Please describe in the text fields as indicated below.]**

Please set forth each service and components of each service (if applicable), along with a description of each service and component service.

From October 1, 2020, the state assures that MAT to treat OUD as defined at section 1905(ee)(1) of the Social Security Act (the Act) is covered exclusively under section 1905(a)(29) of the Act.

1. Individual, Group and/or Family Therapy. Family therapy service that involves the participation of a non-Medicaid eligible is for the direct benefit of the beneficiary. The service must actively involve the beneficiary in the sense of being tailored to the beneficiary's individual needs. There may be times when, based on clinical judgment, the beneficiary is not present during the delivery of the service, but remains the focus of the service.

2. Opioid Services: Opioid services include mental health assessment related to the

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State Plan under Title XIX of the Social Security Act
State/Territory: Iowa

Section 1905(a)(29) Medication Assisted Treatment (MAT)

member’s OUD, counseling, and intervention to improve an individual’s health and well-being. Counseling and intervention are time-limited, structured, face-to-face sessions that work toward the goal’s identified to address the member’s OUD.

Please include each practitioner and provider entity that furnishes each service and component service.

Service	Practitioner/Provider Entity Furnishing Service
Individual, Group and/or Family Therapy	<ul style="list-style-type: none"> • Psychologist • Social Workers, including Independent Social Workers and Master Social Workers • Marital and Family Therapists • Mental Health Counselors
Opioid Services	<ul style="list-style-type: none"> • Psychologists • Social Workers, including Independent Social Workers and Master Social Workers • Marital and Family Therapists • Behavior Analysts and Assistant Behavior Analysts • Mental Health Counselors • Advanced Registered Nurse Practitioners • Behavioral Health Intervention Service Providers • Community Mental Health Centers • Certified Drug and Alcohol Counselors

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**State Plan under Title XIX of the Social Security Act
State/Territory: Iowa**

Section 1905(a)(29) Medication Assisted Treatment (MAT)

Please include a brief summary of the qualifications for each practitioner or provider entity that the state requires. Include any licensure, certification, registration, education, experience, training and supervisory arrangements that the state requires.

Practitioner/Provider Entity	Qualifications
Advanced Registered Nurse Practitioner	<p>Advanced registered nurse practitioners are eligible to participate if they are duly licensed and registered by the State of Iowa as advanced registered nurse practitioners.</p> <p>Advanced registered nurse practitioners in another state are eligible to participate if they are duly licensed and registered in that state as advanced registered nurse practitioners with certification in a psychiatric or mental health specialty.</p> <p>Only practitioners with a special XDEA number can prescribe buprenorphine for treatment of opioid dependence.</p>

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State Plan under Title XIX of the Social Security Act

State/Territory: Iowa

Section 1905(a)(29) Medication Assisted Treatment (MAT)

<p>Psychologists</p>	<p>All psychologists licensed to practice in the State of Iowa and meeting the current credentialing requirements of the National Register of Health Service Psychologists are eligible to participate. Individuals must possess a doctoral degree in psychology.</p> <p>Psychologists in other states are eligible to participate when they are duly licensed to practice in that state and meet the current credentialing requirements of the National Register of Health Service Psychologists.</p> <p>A psychologist provisionally licensed to practice in the State of Iowa is eligible to participate when the person:</p> <ol style="list-style-type: none"> 1. Possesses a doctoral degree in psychology from an institution approved by the board of psychology; and 2. Provides treatment under the supervision of a supervisor who is a licensed psychologist meeting the qualifications determined by the Iowa board of psychology. <p>A psychologist provisionally licensed in another state is eligible to participate when the person:</p> <ol style="list-style-type: none"> 1. Possesses a doctoral degree in psychology from an institution approved by the board of psychology; and 2. Provides treatment under the supervision of a supervisor who is a licensed psychologist meeting the
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TN: IA-25-0034
 Supersedes TN: IA-21-0006

Approval Date: 3/18/2026
 Effective Date: 10/1/2025

State Plan under Title XIX of the Social Security Act

State/Territory: Iowa

Section 1905(a)(29) Medication Assisted Treatment (MAT)

	qualifications determined by the Iowa board of psychology
Marital and Family Therapist	<p>Any person licensed by the Iowa board of behavioral science as a marital and family therapist is eligible to participate.</p> <p>A marital and family therapist in another state is eligible to participate when duly licensed to practice in that state.</p> <p>Any person who holds a temporary license to practice marital and family therapy is eligible to participate when the temporarily licensed marital and family therapist provides treatment under the supervision of a qualified marital and family therapist as determined by the Iowa board of behavioral science</p>
Independent Social Worker	<p>Any person licensed by the Iowa board of social work as an independent social worker, requiring a master's or doctoral degree in social work and practice at that level, is eligible to participate.</p> <p>An independent social worker in another state is eligible to participate when duly licensed to practice in that state.</p>

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Section 1905(a)(29) Medication Assisted Treatment (MAT)

<p>Master Social Worker</p>	<p>A person licensed by the Iowa board of social work as a master social worker is eligible to participate when the person:</p> <ol style="list-style-type: none"> 1. Holds a master's or doctoral degree as approved by the Iowa board of social work; and 2. Provides treatment under the supervision of an independent social worker licensed by the Iowa board of social work. <p>A master social worker in another state is eligible to participate when the person:</p> <ol style="list-style-type: none"> 1. Is duly licensed to practice in that state; and 2. Provides treatment under the supervision of an independent social worker duly licensed in that state.
<p>Mental Health Counselor</p>	<p>Any person licensed by the Iowa board of behavioral science as a mental health counselor is eligible to participate.</p> <p>A mental health counselor in another state is eligible to participate when duly licensed to practice in that state.</p> <p>Any person temporarily licensed by the board of behavioral science as a mental health counselor is eligible to participate when the temporarily licensed mental health counselor provides treatment under the supervision of a mental health counselor meeting the requirements determined by the Iowa board of behavioral science.</p>

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State Plan under Title XIX of the Social Security Act
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Section 1905(a)(29) Medication Assisted Treatment (MAT)

<p>Behavior Analyst and Assistant Behavior Analyst</p>	<p>Behavior Analyst Qualifications: Any person licensed by the Iowa board of behavioral science as a behavior analyst is eligible to participate.</p> <p>A licensed behavior analyst in another state is eligible to participate when duly licensed to practice in that state.</p> <p>Assistant Behavior Analyst Qualifications: A person licensed by the Iowa board of behavioral science as an assistant behavior analyst is eligible to participate when the person:</p> <ol style="list-style-type: none">1. Holds current certification as an assistant behavior analyst by a certifying entity; and2. Provides treatment under the ongoing supervision of a person licensed by the Iowa board of behavioral science in accordance with certifying entity requirements.
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Section 1905(a)(29) Medication Assisted Treatment (MAT)

<p>Behavioral Health Intervention Service Provider</p>	<p>A provider of behavioral health intervention services is eligible to participate when accredited by one of the following bodies:</p> <ol style="list-style-type: none"> 1. The Joint Commission accreditation (TJC), or 2. The Healthcare Facilities Accreditation Program (HFAP), or 3. The Commission on Accreditation of Rehabilitation Facilities (CARF), or 4. The Council on Accreditation (COA), or 5. The Accreditation Association for Ambulatory Health Care (AAAHC), or 6. The Iowa mental health and disability services commission as a provider of services to persons with mental illness, intellectual disabilities, or developmental disabilities. <p>Non-licensed individuals employed by an entity accredited by one of the above bodies must be supervised by an individual who is licensed as a master's level prepared mental health practitioner (e.g., social work, marriage and family therapy, mental health counselor).</p>
<p>Community Mental Health Centers</p>	<p>Community mental health centers (CMHCs) are eligible to participate when they comply with the standards for mental health centers in the State of Iowa established by the Iowa mental health authority. CMHCs are accredited by the Mental Health and Disability Services Division to provide outpatient behavioral health services. CMHCs are not institutions for mental diseases (IMDs), and services provided in an IMD are not covered.</p>

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State Plan under Title XIX of the Social Security Act
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Section 1905(a)(29) Medication Assisted Treatment (MAT)

<p>Certified Drug and Alcohol Counselor</p>	<p>Any person certified by the nongovernmental Iowa board of substance abuse certification as an alcohol and drug counselor is eligible to participate. Qualifications for certification include a high school or general education diploma, 150 clock hours of training in alcohol and drug counselor knowledge and skill competencies, and 1.5 years (3,000 clock hours) of supervised experience. The supervised experience must be conducted by the following certified counselor titles, who must also be in good standing with the Iowa Certification Board (IBC).</p> <ul style="list-style-type: none"> • Certified Alcohol and Drug Counselor (CADC) • International Alcohol and Drug Counselor (IADC) • International Advanced Alcohol and Drug Counselor (IAADC) <p>Certification applicants must be supervised by a counselor certified at a level equal to or higher than the level for which the applicant is applying; however, if an IADC applicant does not have a supervisor who is an IAADC/IADC, or an IAADC does not have a supervisor who is certified as an IAADC, they may be supervised by an individual meeting the following requirements:</p> <ul style="list-style-type: none"> • At least 6000 hours (3 years full time) experience in the substance abuse setting, and would need to provide to the IBC office a letter from his/her agency that he/she is a supervisor in good standing; and
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Section 1905(a)(29) Medication Assisted Treatment (MAT)

	An active certification or license as the following at the time of the supervision: IADC, IAADC, CCDP, CCS, LISW, LMSW, LBSW, LMFA, LMHC, MD, DO, Psychologist or other certification/license as approved by IBC).
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Utilization Controls

[Select all applicable checkboxes below.]

- The state has drug utilization controls in place. (Check each of the following that apply)
- Generic first policy
 - Preferred drug lists
 - Clinical criteria
 - Quantity limits
- The state does not have drug utilization controls in place.

Limitations

[Describe the state's limitations on amount, duration, and scope of MAT drugs, biologicals, and counseling and behavioral therapies related to MAT.]

The only limitations currently in place are edits designed to enforce drug-specific age requirements established by the FDA.

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- 2.) Opioid Services: Opioid services include mental health assessment related to the member's OUD, counseling, and intervention to improve an individual's health and well-

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Section 1905(a)(29) Medication Assisted Treatment (MAT)

being using. Counseling and intervention are time-limited, structured, face-to-face sessions that work toward the goal(s) identified to address the member's OUD.

Please include each practitioner and provider entity that furnishes each service and component service.

Service	Practitioner
Individual, Group and/or Family Therapy	<ul style="list-style-type: none"> • Psychologists • Social Workers, including independent Social Workers and Master Social Workers • Marital and Family Therapists • Mental Health Counselors
Opioid Services	<ul style="list-style-type: none"> • Psychologists • Social Workers, including Independent Social Workers and Master Social Workers • Marital and Family Therapists • Behavior Analysts and Assistant Behavior Analysts • Mental Health Counselors • Advanced Registered Nurse Practitioners • Behavioral Health Intervention Service Providers • Community Mental Health Centers • Certified Drug and Alcohol Counselors

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State/Territory: Iowa**

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Please include a brief summary of the qualifications for each practitioner or provider entity that the state requires. Include any licensure, certification, registration, education, experience, training and supervisory arrangements that the state requires.

Practitioner/Provider Entity	Qualifications
Advanced Registered Nurse Practitioner	<p>Advanced registered nurse practitioners are eligible to participate if they are duly licensed and registered by the State of Iowa as advanced registered nurse practitioners.</p> <p>Advanced registered nurse practitioners in another state are eligible to participate if they are duly licensed and registered in that state as advanced registered nurse practitioners with certification in a psychiatric or mental health specialty.</p> <p>Only practitioners with a special XDEA number can prescribe buprenorphine for treatment of opioid dependence.</p>
Psychologists	<p>All psychologists licensed to practice in the State of Iowa and meeting the current credentialing requirements of the National Register of Health Service Psychologists are eligible to participate. Individuals must possess a doctoral degree in psychology.</p> <p>Psychologists in other states are eligible to participate when they are duly licensed to practice in that state and meet the current credentialing requirements of the National Register of Health Service Psychologists.</p>

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**State Plan under Title XIX of the Social Security Act
State/Territory: Iowa**

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	<p>A psychologist provisionally licensed to practice in the State of Iowa is eligible to participate when the person:</p> <ol style="list-style-type: none"> 1. Possesses a doctoral degree in psychology from an institution approved by the board of psychology; and 2. Provides treatment under the supervision of a supervisor who is a licensed psychologist meeting the qualifications determined by the Iowa board of psychology. <p>A psychologist provisionally licensed in another state is eligible to participate when the person:</p> <ol style="list-style-type: none"> 1. Possesses a doctoral degree in psychology from an institution approved by the board of psychology; and 2. Provides treatment under the supervision of a supervisor who is a licensed psychologist meeting the qualifications determined by the Iowa board of psychology.
<p>Marital and Family Therapist</p>	<p>Any person licensed by the Iowa board of behavioral science as a marital and family therapist is eligible to participate.</p> <p>A marital and family therapist in another state is eligible to participate when duly licensed to practice in that state.</p>

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	Any person who holds a temporary license to practice marital and family therapy is eligible to participate when the temporarily licensed marital and family therapist provides treatment under the supervision of a qualified marital and family therapist as determined by the Iowa board of behavioral science.
Independent Social Worker	<p>Any person licensed by the Iowa board of social work as an independent social worker, requiring a master's or doctoral degree in social work and practice at that level, is eligible to participate.</p> <p>An independent social worker in another state is eligible to participate when duly licensed to practice in that state.</p>
Master Social Worker	<p>A person licensed by the Iowa board of social work as a master social worker is eligible to participate when the person:</p> <ol style="list-style-type: none"> 1. Holds a master's or doctoral degree as approved by the Iowa board of social work; and 2. Provides treatment under the supervision of an independent social worker licensed by the Iowa board of social work. <p>A master social worker in another state is eligible to participate when the person:</p> <ol style="list-style-type: none"> 1. Is duly licensed to practice in that state; and

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	2. Provides treatment under the supervision of an independent social worker duly licensed in that state.
Mental Health Counselors	<p>Any person licensed by the Iowa board of behavioral science as a mental health counselor is eligible to participate.</p> <p>A mental health counselor in another state is eligible to participate when duly licensed to practice in that state.</p> <p>Any person temporarily licensed by the board of behavioral science as a mental health counselor is eligible to participate when the temporarily licensed mental health counselor provides treatment under the supervision of a mental health counselor meeting the requirements determined by the Iowa board of behavioral science.</p>
Certified Drug and Alcohol Counselor	<p>Any person certified by the nongovernmental Iowa board of substance abuse certification as an alcohol and drug counselor is eligible to participate. Qualifications for certification include a high school or general education diploma, 150 clock hours of training in alcohol and drug counselor knowledge and skill competencies, and 1.5 years (3,000 clock hours) of supervised experience. The supervised experience must be conducted by the following certified counselor titles, who must also be in good standing with the Iowa Certification Board (IBC).</p>

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	<ul style="list-style-type: none"> • Certified Alcohol and Drug Counselor (CADC) • International Alcohol and Drug Counselor (IADC) • International Advanced Alcohol and Drug Counselor (IAADC) <p>Certification applicants must be supervised by a counselor certified at a level equal to or higher than the level for which the applicant is applying; however, if an IADC applicant does not have a supervisor who is an IAADC/IADC, or an IAADC does not have a supervisor who is certified as an IAADC, they may be supervised by an individual meeting the following requirements:</p> <ul style="list-style-type: none"> • At least 6000 hours (3 years full time) experience in the substance abuse setting, and would need to provide to the IBC office a letter from his/her agency that he/she is a supervisor in good standing; and • An active certification or license as the following at the time of the supervision: IADC, IAADC, CCDP, CCS, LISW, LMSW, LBSW, LMFA, LMHC, MD, DO, Psychologist or other certification/license as approved by IBC).
Behavior Analyst and Assistant Behavior Analyst	Behavior Analyst Qualifications: Any person licensed by the Iowa board of behavioral

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	<p>science as a behavior analyst is eligible to participate.</p> <p>A licensed behavior analyst in another state is eligible to participate when duly licensed to practice in that state.</p> <p>Assistant Behavior Analyst Qualifications: A person licensed by the Iowa board of behavioral science as an assistant behavior analyst is eligible to participate when the person:</p> <ol style="list-style-type: none"> 1. Holds current certification as an assistant behavior analyst by a certifying entity; and 2. Provides treatment under the ongoing supervision of a person licensed by the Iowa board of behavioral science in accordance with certifying entity requirements.
Behavioral Health Intervention Service Provider	<p>A provider of behavioral health intervention services is eligible to participate when accredited by one of the following bodies:</p> <ol style="list-style-type: none"> 1. The Joint Commission accreditation (TJC), or 2. The Healthcare Facilities Accreditation Program (HFAP), or 3. The Commission on Accreditation of Rehabilitation Facilities (CARF) 4. The Council on Accreditation (COA) or 5. The Accreditation Association for Ambulatory Health Care (AAAHC) or

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	<p>6. The Iowa mental health and disability services commission as a provider of services to persons with mental illness, intellectual disabilities, or developmental disabilities</p> <p>Non-licensed individuals employed by an entity accredited by one of the above bodies must be supervised by an individual who is licensed as a master's level prepared mental health practitioner (e.g., social work, marriage and family therapy, mental health counselor).</p>
Community Mental Health Center	<p>Community mental health centers (CMHCs) are eligible to participate when they comply with the standards for mental health centers in the State of Iowa established by the Iowa mental health authority. CMHCs are accredited by the Mental Health and Disability Services Division to provide outpatient behavioral health services. CMHCs are not institutions for mental diseases (IMDs), and services provided in an IMD are not covered.</p>

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Utilization Controls

[Select all applicable checkboxes below.]

The state has drug utilization controls in place. (Check each of the following that apply)

- Generic first policy
- Preferred drug lists
- Clinical criteria
- Quantity limits

The state does not have drug utilization controls in place.

Limitations

[Describe the state's limitations on amount, duration, and scope of MAT drugs, biologicals, and counseling and behavioral therapies related to MAT.]

The only limitations currently in place are edits designed to enforce drug-specific age requirements established by the FDA.

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