

Questions & Answers: August 20, 2026

Thursday Connections with SUD at DHS Meeting

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BEHAVIORAL HEALTH FUND (BHF) ELIGIBILITY DETERMINATION

Are you keeping a database of clients who are found ineligible for BHF, and would the county have that information in MMIS or MAXIS, so we would know ahead of time if a client applying for help would not be eligible?

A: DHS maintains internal application records; these are not available publicly. Providers are encouraged to confirm existing eligibility by checking MN-ITS or by receipt of a BHF Approval Notice from DHS. When an applicant is determined to be ineligible for BHF, this denial applies only to the current timeframe. Future eligibility may be possible depending on whether they meet eligibility criteria during a future timeframe. BHF eligibility criteria are available at: [Behavioral Health Fund Eligibility / Minnesota Department of Human Services](#)

► *Reference: Slide 7 (BHF Eligibility Criteria)*

Many clients never open their notification letters, or, because they are unhoused, they move before their mail catches up with them. Could a secondary audit notification letter be sent to the email listed on the application and/or the secondary contact listed on the application?

A: Yes — DHS already sends notification of selection for Income and Household Verification ("audit") to the county, secondary contacts, and the applicant's email or mailing address (along with the eligibility notification).

► *Reference: Slide 19 (BHF Process: Applicant Notifications)*

For clients who are currently incarcerated and need BHF funding to be released to treatment (assessment/intake), is there a way to expedite the PMI search/assignment process?

A: DHS is working to process PMI number search or creation in a timely manner. DHS is not able to prioritize requests based on case-specific circumstances. Notification will be sent to applicant and secondary contact (if listed in application) once the span has been entered into electronic eligibility system. Currently we are being supported by another work unit for this PMI search/creation needs. The BHF Eligibility Team is looking into options to be able to complete these tasks within our team in the future.

► *Reference: Slide 18 (BHF Process: Determinations)*

When a client is incarcerated and DHS is unable to get a physical signature on the BHF form, but the client provides verbal consent, is there a way to document that consent?

A: At this time, applicant signature is required on the BHF application, either written or the applicant electronically typing in their name as a signature. Providers with unique barriers to applicants physically signing application should contact dhs.bhf@state.mn.us to share their concerns.

Who is responsible if BHF funds are denied following an audit — the client or the agency that received the funds?

A: A client's initial BHF funding span is unaffected by income and household verification outcomes. However, failure to complete the verification process or providing false information will result in ineligibility for future BHF funding spans.

► *Reference: Slides 16–17 (BHF Process & Timeline: Audit)*

Q: If a provider cannot determine the county of financial responsibility (CFR) — for example, because the provider does not have MMIS access and cannot see whether a client has an open social service case — how can the correct county be identified in order to request a Living Arrangement (LA) change (e.g., for an incarcerated client)?

A: County of financial responsibility (CFR) information is included with DHS notifications to applicants and secondary contacts.

Q: We entered our email to receive a secondary notification of BHF status (approved or denied), but we are not receiving any status notifications — why? We've had to keep checking MN-ITS manually for roughly 5 of 25 applications submitted.

A: At the time of this meeting, DHS notifications were delayed, but many are now being sent within 5 days of the application decision. DHS is seeing issues with misspelled secondary contact email addresses and handwritten entries that are difficult to read. Some email systems may also be blocking DHS encrypted emails. **Please wait 10 business days after submitting an application before emailing dhs.bhf@state.mn.us to inquire about a notification.**

DHS is developing an automated tool that will complete BHF eligibility forms and send them by encrypted email.

► *Reference: Slide 15 (Applicant & Secondary Contact Notification)*

COUNTY OF FINANCIAL RESPONSIBILITY (CFR), LIVING ARRANGEMENT & VERIFICATION

Q: What do we do if the county we're disputing CFR with doesn't respond? What is the timeline?

A: If a County of Financial Responsibility (CFR) dispute form is not completed by another CFR ("agreeing CFR"), you may choose to file an appeal. Please see this website for information on filing an appeal: [How to Appeal - County of Financial Responsibility Determination for Behavioral Health Fund](#)

► *Reference:* [County of Financial Responsibility Dispute form / Minnesota Department of Human Services](#)

Q: It appears that CFR notices are getting missed — there have been several cases in an open (OO) span where we don't have a CFR notice for the client. Any idea what's going on with that?

A: The BHF Notice to Tribe/County of Financial Responsibility (CFR) (2780F) form was temporarily suspended on August 14, 2026, to speed up the manual notification process.

For now, DHS sends CFR information to counties and tribal nations in a table that includes applicant information, along with a copy of the BHF application. DHS is developing an automated tool that will complete the 2780F form and send it to counties and tribal nations by encrypted email. We are working to improve the process so that counties and tribes receive notification the same day a span is entered.

► *Reference:* Slide 20 (BHF Process: Tribe/County of Financial Responsibility (CFR));

Q: If DHS makes a mistake and it's very clear from the application that the client is not our CFR, can DHS just correct it if we point it out, or do we need to go through the full CFR dispute process?

A: If it appears the CFR was determined incorrectly, please send the applicant information in an encrypted email to dhs.bhf@state.mn.us. DHS will review and respond to the request. A correction of CFR is possible in cases of human error.

► *Reference:* Slide 22 (CFR Role)

Q: We're getting a lot of "mass" living arrangement emails with numerous clients listed in one email. Many of these are missing attachments, or the attachments are missing information, and they're coming to us late. What is the timeline expectation for us to complete the LA, and are there payment implications for delays?

A: Thank you for bearing with these batch email notifications during this transition period.

1) DHS has identified some errors with opening pdfs that appear blank. If the pdf appears blank, please right click the document and select "open with" and select "open in Edge", then wait 3-4 seconds for document to load.

If the document still appears blank (or is missing from notification email), please send email to dhs.bhf@state.mn.us indicating "MISSING APPLICATION" or "Blank PDF". DHS is developing an automated tool that will complete the 2780F form and send individually for each application determination to counties and tribal nations by encrypted email.

2) Counties and tribes are responsible for updating living arrangements (LA). Delays in updating the LA or other eligibility information may cause providers to delay starting SUD services. However, a specific timeline is not listed in Minnesota statutes.

► *Reference:* Slide 20 (CFR); Slide 24 (Process Improvement: Next Steps);

Q: Why has the Living Arrangement (LA) process changed? We are no longer able to enter LAs directly in MMIS and now have to submit HPEN requests instead. Any insight on this?

A: DHS is not aware of any changes to the process of counties updating living arrangements. To share ongoing concerns that could not be addressed at the county level, please send an email with specific cases to dhs.bhf@state.mn.us

► *Reference: Slide 22 (CFR Role)*

Q: We used to verify client income as part of eligibility determination — this does not appear to be happening at DHS now. What are the federal implications if income isn't verified, and who would be responsible for paybacks?

A: Attestation on the application legally meets the requirement to verify income and household size for the purpose of determining program eligibility.

► *Reference: [Income and Household Request form \(2780d\)](#) and [Side-by-Side Legislative Changes 2025: Behavioral Health Fund Reform](#).*

Q: Since immigration status isn't being checked, who is responsible for paybacks if the federal government discovers immigration-related eligibility issues?

A: Information on immigration status is not being collected and is not a factor in determining BHF eligibility. DHS cannot predict or speak for the federal government regarding future decisions or actions.

► *Reference: Slide 7 (BHF Eligibility Criteria) - Resident of Minnesota (per MHCP definition)*

SUD TREATMENT SERVICES / PROCEDURE CODE & BILLING CHANGES

Do we use the old or new procedure codes for outpatient SUD services?

A: Use the new outpatient procedure codes for Medical Assistance and Fee-for-Service to bill for dates of service on and after August 1, 2026. See the [Substance Use Disorder Service Rate Grid](#) for more information. For all other payers, including MCOs/PMAPs, contact the payor directly to find out which procedure codes to use.

► *Reference: Slide 32 (Summary of Changes Effective Aug. 1, 2026); Meeting Transcript (SUD Treatment Services & Procedure Code Changes segment)*

Do you know when Federal approval will happen?

A: DHS is working with CMS on approval of the State Plan Amendment, which will be approved retroactive to August 1, 2026.

► *Meeting Transcript (SUD Treatment Services & Procedure Code Changes segment)*

Some MCOs will not pay claims with the new procedure codes until federal approval is received. Should we use the old codes until this happens for these PMAP programs? Are PMAPs still required to have the new 15-minute procedure codes in their system by October 1st?

A: All MCOs will eventually switch to the new outpatient procedure codes but the specific implementation date is up to each individual MCO and they can choose to wait until CMS gives their official approval. Providers should contact the specific MCO to confirm its current billing procedure and which procedure codes should be used.

► *Reference: Meeting Transcript (SUD Treatment Services & Procedure Code Changes segment)*

Providers are not getting paid for outpatient services by any payer other than MA/Direct Access - is there a point of contact to escalate these payer and procedure-code payment problems?

A: Providers should contact the specific payer to confirm their current billing procedure, including which procedure codes to use for the date the service was provided, and direct billing questions and concerns to the payer first. If an issue cannot be resolved with an MCO, providers can send specific examples of MCO non-payment to the DHS MCO liaison at DHS_BHD_MCO@state.mn.us or the SUD Policy and Reform team at SUD.Direct.Access.DHS@state.mn.us. Please include documentation of contact with the MCO(s), such as dates and methods of communication, names of MCO staff contacted, ticket or work order numbers, and reasons for claims denials.

► *Reference: Meeting Transcript (SUD Treatment Services & Procedure Code Changes segment); Slide 36 (Questions) - contact SUD.Direct.Access.DHS@state.mn.us*

For adolescent SUD services, do providers use the same procedure codes as for adults, with the HA modifier added?

A: The procedure codes for outpatient SUD services are the same for adults and adolescents. The HA modifier is added to outpatient counseling and outpatient psychoeducation codes for adolescents; it is not added to treatment coordination, recovery support, or peer recovery codes for adolescents. See the [Substance Use Disorder Service Rate Grid](#) for more information.

► *Reference: Slide 32 (Summary of Changes Effective Aug. 1, 2026); Meeting Transcript (SUD Treatment Services & Procedure Code Changes segment)*

DOCUMENTATION & LICENSING (245G)

Can you clarify the effective date for the change to complete service discharge summaries (excluding weekends/holidays)? There is conflicting information, with some sources reporting 8/1/2026 and others reporting 1/1/2027.

A: The effective date is 08/01/2026. If there are additional questions related to this, please contact the licensing unit at dhs.mhcdlicensing@state.mn.us.

Minn. Stat. 245G.06, Subd. 2a (Documentation of treatment services) requires that each treatment service be documented, including date, type, amount, and the client's response. Is there another location in statute or billing guidance that requires the type of therapy used (e.g., CBT or MI), the client's progress, and a continuing plan for the client to be included in a billing note?

A: Requirements for documentation of services paid for via Medical Assistance are found in [MN Rules Part 9505.2175](#). Insurance providers may also have different requirements that are not in statute, and a program may also set policies and procedures that exceed statute requirements. If there are additional questions related to treatment services documentation requirements, please contact the licensing unit at dhs.mhcdlicensing@state.mn.us.