

MI Opioid Treatment Access Loan Repayment Program (MIOTA LRP)

Fiscal Year 2020 Application & Program Guidance

Table of Contents

PROGRAM OVERVIEW.....	2
ELIGIBILITY.....	2
Eligible MIOTA LRP Provider Types:.....	2
Eligible Practice Sites:	3
Service Obligation Period.....	3
Service Obligation Requirement.....	3
PAYMENT PROCESS.....	6
Maximum Award Amount.....	6
Service Verifications.....	8
Registration on Sigma Vendor Self Service (VSS).....	8
Change of Personal Information Reporting Requirements	8
APPLICATION FORMS AND PROCESS	8
Application Form.....	8
Required Supporting Documentation.....	9
DEFINITIONS.....	10

PROGRAM OVERVIEW

The Michigan Opioid Treatment Access Loan Repayment Program (MIOTA LRP) is a medical education debt repayment program focused on incentivizing healthcare providers to begin and expand opioid treatment in Michigan. Eligible providers will receive loan repayment for beginning or expanding opioid treatment in Michigan for two years of service and by completing specific requirements outlined in this document.

The application period starts on October 31, 2019 and ends November 30, 2019.

For Questions, please call 517-335-6713 Monday through Friday 8:00 am to 5:00 pm ET.

This program was initially funded by the Michigan Health Endowment Fund and is now funded and administered by the Michigan Department of Health and Human Services.

ELIGIBILITY

To qualify for the Michigan Opioid Treatment Access Loan Repayment Program (MIOTA LRP), applicants must do one of the following:

- 1) Obtain a Drug Enforcement Agency (DEA) registration certificate that clearly reflects the possession of a DATA 2000 Waiver and begin providing medication treatment of Opioid Use Disorder (MOUD) to patients in Michigan, or
- 2) be providing AND expanding medication treatment to patients with Opioid Use Disorder (MOUD) in Michigan by having obtained a DEA registration certificate that clearly reflects the possession of a DATA 2000 Waiver, and in the case of physicians, applying for a patient limit increase, or
- 3) be providing AND expanding medication treatment to patients with Opioid Use Disorder (MOUD) in Michigan by having obtained a DEA registration certificate that clearly reflects the possession of a DATA 2000 Waiver, and increasing the number of patients being treated, or
- 4) be a Substance Use Disorder Counselor beginning to provide counseling and/or expanding practice to provide more clients with counseling.

Eligible MIOTA LRP Provider Types:

Applicants must have one of the following professional titles and an appropriate unencumbered license in the State of Michigan to be eligible for loan repayment through the MIOTA LRP.

- Physicians (MDs or DOs)

- Nurse Practitioners (NP)
- Physician Assistants (PA)
- Substance Use Disorder (SUD) Counselors

Providers must be working on a full-time basis at the approved practice site.

Exclusion from Eligibility:

Providers may not be dually enrolled in this loan repayment program and any other loan repayment program with a service obligation (for example, the Michigan State Loan Repayment program or the National Health Service Corps).

Eligible Practice Sites:

Practice sites for eligible providers may be located anywhere in the state.

Eligible practice sites do not need to be in a Health Professional Shortage Area designation.

Eligible practice sites should be those that provide treatment of OUD in inpatient and/or outpatient care; such as: primary care, family medicine, office based opioid treatment sites (OBOTs), opioid treatment programs (OTPs), emergency medicine, inpatient psychiatry, hospital-based medical care, jails, prisons, private practices, and urgent care clinics. All practice sites can be eligible; the goal is to incentivize as broad a spectrum of providers as possible to expand the state's capacity to treat opioid use disorder.

Service Obligation Period

Any provider participating in this program will be eligible to receive loan repayment for two-years with a two-year service requirement starting February 1, 2020 and ending January 31, 2022. Every participant will sign a contract with MDHHS agreeing to a repayment process if a breach occurs.

Service Obligation Requirement

Physician participants:

If you are a physician (MD or DO) and you are accepted into this program, you must do one of the following:

- Apply for and receive a DEA registration certificate that clearly reflects the possession of a DATA 2000 Waiver by June 1, 2020 or
- Apply for and receive approval to increase the patient limit of the current DATA 2000 Waiver in the first year of the Service Obligation Period, or
- Possess a DATA 2000 Waiver and expand opioid treatment by increasing the number of patients you see, within your current waiver patient limit.

If you are a physician (MD or DO) and you are accepted into this program, you must also:

- Provide a plan outlining how you will expand your opioid use disorder (OUD) treatment practice. All providers in a non-primary care setting must include how OUD patients will be referred to long-term OUD treatment once a patient has left the acute care or other short-term or temporary settings (such as jails, prisons, inpatient medical services).
- Provide data as requested on your expanded practice on a biannual basis.

If you are a physician (MD or DO) and you are accepted into this program, you must do all of the following in the first six months of the Service Obligation Period:

- Submit a plan to provide for SUD counseling for SUD patients. This plan will detail the provider's plan for making referrals to SUD counseling services and providing information on available community group or self-help resources or any other supportive resources.
- Obtain state licensure for the SUD program if an individual, or individuals in a group practice, is offering psychological or medical services and providing buprenorphine or naltrexone treatment to more than 100 individuals at any one time at a specific property.
- Provide data as requested on your expanded practice on a biannual basis

In the remainder of the Service Obligation Period providers must continue to provide opioid use disorder treatment services at their approved practice site location.

[Nurse Practitioners and Physician Assistant participants:](#)

If you are a Nurse Practitioner or Physician's Assistant and you are accepted into this program, you must do one of the following:

- Complete the required 24 hours of required training to obtain a DATA 2000 waiver and apply for and receive a DEA registration certificate that clearly reflects the possession of a DATA 2000 Waiver, or
- Possess a DATA 2000 Waiver and expand opioid treatment by increasing the number of patients you see, within your current waiver patient limit; AND
- Provide a plan outlining how you will expand your opioid use disorder treatment patient load and practice. All providers in a non-primary care setting must include how OUD patients will be referred to long-term OUD treatment once a patient has left the acute or transitional care setting.

In addition, if you are accepted into this program, you must also:

- Provide data as requested on your expanded practice on a biannual basis.
- Obtain state licensure for SUD program if an individual, or individuals in a group practice, is offering psychological or medical services and providing buprenorphine or naltrexone treatment to more than 100 individuals at any one time at a specific property.
- Provide data as requested on your expanded practice on a biannual basis

In the remainder of the Service Obligation Period providers must continue to provide opioid use disorder treatment services at their approved practice site location.

MAT Prescribers in Acute and Transitional Settings

If you provide or plan to begin or expand providing MOUD treatment to patients in an acute or transitional care setting, you must:

- Provide a plan explaining in general terms how you will refer OUD treatment patients to long-term MAT and/or OUD treatment after they have left the acute care or other transitional setting (such as emergency department, inpatient hospitalization, jail, prison).

(Example: You work as an emergency medicine physician and you want to begin initiating medication for persons with OUD who appear in the emergency room. Or you work in a local jail as a prescriber for people who are being released to the community. Or you work as a pain specialist and you want to begin an individual on medication to treat their OUD and then refer to an addiction specialist. Or you work in an inpatient medical setting and see people admitted for infectious disease complications and you wish to begin medications in the medical setting. In your application you would explain how linkages to community providers to continue treatment have been developed so that the patients you treat will be able to continue the treatment.)

Substance Use Disorder Counselor participants:

Substance Use Disorder Counselors must have a valid substance use disorder certification and a valid professional license and must provide full-time SUD counseling for the duration of the Service Obligation Period.

If you are a Substance Use Disorder Counselor, you must also:

- Obtain state licensure for SUD program if an individual, or individuals in a group practice, is offering psychological or medical services and providing buprenorphine or naltrexone treatment to more than 100 individuals at any one time at a specific property.

Patient Target Goals

Participants will be required to set specific annual patient increase goals. This number should indicate how many OUD patients you will be able to begin seeing over and above your current practice pattern during each year of the service obligation. This goal should be included in your OUD treatment practice expansion plan and that plan should explain what steps you will take and which activities you will perform to meet that goal.

This goal will be used to measure how the program will increase treatment capacity, as a tool to focus involvement in the program, and as a dataset for future MIOTA LRP cycles. Baseline practice data will help inform improvements in expanding services through this MIOTA LRP. Please note that providers will not be penalized if circumstances prevent the goal's achievement despite good-faith efforts by the provider.

New Access Bonus

A bonus will be provided to providers who begin offering OUD treatment in a county where medication-assisted treatment using buprenorphine or methadone is not currently available. These counties are:

Ontonagon	Keweenaw	Iron	Menominee	Alger
Schoolcraft	Luce	Presque Isle	Alcona	Oscoda
Crawford	Leelanau	Benzie	Osceola	Missaukee
Arenac	Ogemaw	Gladwin	Clare	St. Joseph
Hillsdale				

PAYMENT PROCESS

The approved medical education debt repayment will be made directly to the healthcare provider, not to their lender. Providers are required to pay down their qualifying educational loans for reasonable education expenses by an amount at least equal to the payment they receive from the MIOTA program.

Maximum Award Amount

Use the chart below to determine the amount of loan repayment you are eligible to receive. The amount of loan repayment cannot exceed the amount of debt owed in medical education loans.

Provider Type	Waiver Status	Annual Target for New OUD Patients¹	Maximum Amount of Loan Repayment
Physicians (MD or DO)			
	Currently has a DATA 2000 Waiver and is treating fewer than 5 patients	10	\$15,000
	Currently does not have a DATA 2000 Waiver and will receive a DATA 2000 Waiver for a 30-patient limit by January 1, 2020	10	\$20,000
	Currently has a DATA 2000 Waiver with a 30-patient limit and will receive a DATA 2000 Waiver for a 100-patient limit within the first year of the Service Obligation Period	20	\$25,000
	Currently has a DATA 2000 Waiver with a 100-patient limit and will receive a DATA 2000 Waiver for a 275-patient limit within the first year of the Service Obligation Period	50	\$30,000
Nurse Practitioners & Physician Assistants			
	Currently has a DATA 2000 Waiver and is treating fewer than 5 patients	10	\$15,000
	Will complete the required training and receive a DATA 2000 Waiver by January 1, 2020	10	\$15,000
	Currently has a DATA 2000 Waiver and is treating fewer than 5 patients, or will complete the required training and receive a DATA 2000 Waiver by January 1, 2020	50	\$25,000
Substance Use Disorder Counselor			
	Will expand client number from baseline to provide additional full-time SUD counseling	10	\$15,000
New Access Bonus			
	Additional award for providers expanding into counties with no MAT providers	N/A	\$5,000
¹ Note that new patient goals are above and beyond current caseload or practice patterns.			

Service Verifications

Each participant that is successfully enrolled in this program will be required to submit data. Data will be requested every six months regarding the size of the opioid treatment patient caseload and steps taken to meet the requirements of this program.

Registration on Sigma Vendor Self Service (VSS)

All providers participating in this program (considered “vendors” in SIGMA VSS) must immediately register for electronic funds transfer (EFT) on SIGMA VSS (<https://sigma.michigan.gov/webapp/PRDVSS2X1/AltSelfService>). This will allow MIOTA LRP payments to be electronically deposited into your personal checking or savings account. Providers will receive their fully-executed MIOTA LRP agreements attached to an email announcing their fully-executed LRP agreement package.

Change of Personal Information Reporting Requirements

Providers must notify the MIOTA LRP Office of ANY personal information changes (including name, home address, phone numbers and email address) and change their profiles on SIGMA Vendor Self Service (VSS) no less than 10 calendar days before they occur. Your personal information must be the same at the MIOTA LRP Office and on SIGMA VSS to receive LRP payments.

APPLICATION FORMS AND PROCESS

This is a two-year program. Opioid Treatment Providers may apply starting October 21, 2019 and will end on November 30, 2019.

Application Form

There is one Provider Application Form and it must be mailed to the MDHHS in a single package, together with all the required supporting documentation. Eligible providers must complete the Provider Application Form entirely and submit the supporting evidence in order to qualify for the program.

A complete MIOTA LRP Application Package consists of:

1. Completed Application Form, and
2. Required Supporting Documentation

Application Packages Must be Mailed with a Postmark on Envelope:

All documents must arrive together at the MIOTA LRP Office by mail in a single envelope, with a clearly-visible postmark and each document must be entirely complete and legible.

MIOTA LRP cannot accept application forms submitted separately, or submitted by email, phone, or fax. Application packages must include clear postmarks to determine their place among all documents pending review.

All application packages must be mailed together in a single envelope to:

**Megan Linton
Office of Planning
Michigan Department of Health and Human Services
South Grand Building
P.O. Box 30195
Lansing, MI 48909**

The Application Form must be completed by the provider applying for loan repayment. It should be typed, then printed, signed and mailed to the MIOTA LRP Office as part of your application package.

The Application Form is broken up into four sections and it will not be considered complete unless it contains information on each of the following required sections and the corresponding supporting documents:

1. Personal Information: Enter the answers for each question from 1a to 1p.

2. Education & Professional Information: Enter the answers for each question from 2a to 2e.

3. Opioid Treatment Practice Information: Provide information about the opioid treatment that will be provided, questions 3a to 3g.

4. Eligibility: Provide information about the location and type of practice for questions 4a to 4f.

5. Loan Information: You must list all educational loans for which you have a remaining balance and whether or not they entail a service obligation. Include only loans that funded your undergraduate or graduate education and training that led to the professional license necessary for the position at which you will fulfill your MIOTA LRP service obligation. Please list the information about all your current educational loans in the “Current Loans” section.

Note: If you have consolidated or refinanced any eligible loan with a non-educational loan, no portion of the consolidated/refinanced loan is eligible for loan repayment and must not be listed in this section.

Required Supporting Documentation

- 1) Proof of Waiver Status:** Physician applicants will be required to provide documentation of the DATA 2000 waiver status, if applying for an amount of loan repayment that includes increasing the patient limit.
- 2) Plan for SUD Counseling:** Physician applicants must submit a plan for providing SUD counseling for SUD patients. This plan should detail the provider’s plan for making

referrals to SUD counseling services and providing information on available community group or self-help resources or any other supportive resources.

- 3) **Proof of Opioid Treatment Certification:** Substance Use Disorder Counselor applicants will be required to provide documentation showing that they are certified to provide drug counseling and treatment.
- 4) **State Licensure for SUD Program:** Applicants will be required to provide documentation of the state licensure for the SUD program if an individual, or individuals in a group practice, is offering psychological or medical services and providing buprenorphine or naltrexone treatment to more than 100 individuals at any one time at a specific property.
- 5) **Loan Information Verification:** Applicants will be required to provide two types of documentation for each loan that is being submitted for consideration:
 - a) **Account Statement:** This document is used to provide current information on the applicant's qualifying educational loans, indicating the status of his/her loan balance. This document should:
 - be on official letterhead or other clear verification that it comes from the lender/holder;
 - include the name of the applicant;
 - contain the account number;
 - include the date of the statement (cannot be more than 30 days from the date of LRP application submission);
 - include the current outstanding balance (principal and interest) or the current payoff balance; and
 - include the current interest rate.
 - b) **Loan Disbursement Report:** This report is used to verify the originating loan information and should:
 - be on official letterhead or other clear verification that it comes from the lender/holder;
 - include the name of the applicant;
 - contain the account number;
 - include the type of loan;
 - include the original loan date (must be prior to the date of the application submission); and
- 6) include the original loan amount;

DEFINITIONS

DATA 2000 Waiver—A waiver obtained under the Controlled Substances Act (CSA), 21 U.S.C. § 823(g)(2), as amended by the Drug Addiction Treatment Act of 2000 (DATA 2000), and the Comprehensive Addiction and Recovery Act of 2016, that permits physicians, nurse practitioners, and physician assistants who meet certain qualifications to treat opioid use disorder with Schedule III, IV, and V narcotic medications, including buprenorphine, or

combinations of such medications, that are approved by the Food and Drug Administration (FDA) in treatment settings other than opioid treatment programs (OTPs).

Fiscal Year (FY)—Defined as October 1 through September 30.

Full-Time Clinical Practice – For the purposes of the MIOTA program, full-time clinical practice is defined as a minimum of 40 hours/week, for a minimum of 45 weeks each service year. The 40 hours/week may be compressed into no less than 4 days/week, with no more than 12 hours of work to be performed in any 24-hour period. Of the 40 hours/week, a minimum of 32 hours must be spent providing patient care. Participants do not receive service credit for hours worked over the required 40 hours/week and excess hours cannot be applied to any other work week. Also, time spent “on call” will not be counted towards the service obligation, except to the extent the provider is providing patient care during that period. Clinical service provided by MIOTA participants while a student/resident observes, should be counted as patient care as the MIOTA participant is treating the patient.

Holder—The commercial or government institution that currently holds the promissory note for the qualifying educational loan (e.g., Sallie Mae, PHEAA, etc.).

Lender—The commercial or government institution that initially made the qualifying loan (e.g., Department of Education).

Medication-Assisted Treatment (MAT)—The use of FDA-approved medications, in combination with counseling and behavioral therapies, to provide a “whole-patient” approach to treatment of substance use disorders.

Qualifying Educational Loans—Government and private student loans for actual costs paid for tuition and reasonable educational and living expenses related to undergraduate or graduate education of the participant that were obtained by the clinician prior to their submission of an application to participate in the MIOTA LRP. Such loans must be contemporaneous with the education received. Participants will receive funds for repayment of qualifying educational loans that are still owed. If the applicant has a consolidated/refinanced loan that is made up entirely of qualifying educational loans of the applicant, the consolidated/refinanced loan is eligible for repayment. If the applicant has consolidated otherwise qualifying educational loans with any non-qualifying debt, no portion of the consolidated/refinanced loan will be eligible.

Reasonable Educational Expenses—The costs of education, exclusive of tuition, such as fees, books, supplies, clinical travel, educational equipment and materials, and board, certification/licensing exams, which do not exceed the school’s estimated standard student budget for educational expenses for the participant’s degree program and for the year(s) of that participant’s enrollment.

Solo or Group Private Practice—A clinical practice that is made up of either one or many providers in which the providers have ownership or an invested interest in the practice. Private

practices can be arranged to provide primary medical, dental, and/or mental health services and can be organized as entities on the following basis: fee-for-service; capitation; a combination of the two; family practice group; primary care group; or multi-specialty group.

Substance Use Disorder—Involves the overuse of, or dependence on, one or more substances leading to a clinically significant impairment whose effects are detrimental to the individual’s physical and mental health, or the welfare of others.

Substance Use Disorder Licensure—Providers that offer SUD services in the State of Michigan must obtain a license from the MI Department of Licensing and Regulatory Affairs (LARA).

Information about state SUD licensing is found at LARA’s website:

https://www.michigan.gov/lara/0,4601,7-154-89334_63294_30419---,00.html.

Substance Use Disorder Treatment—As used in this Guidance and for purposes of the MIOTA LRP, substance use disorder treatment refers to substance use disorder related care that is delivered based on a standardized assessment of substance use disorder treatment needs.

Unencumbered License – A license that is not revoked, suspended, or made probationary or conditional by the state licensing authority as the result of disciplinary action.