

August 29, 2025

Dear Tribal Partners:

This letter is regarding the Tribal Consultation between the North Dakota Department of Health and Human Services and the North Dakota Indian Tribes. The consultation process was established to ensure Tribal governments are included in the decision-making processes when proposed changes in the Medicaid or Children's Health Insurance Program(s) will directly impact the North Dakota Tribes and/or their Tribal members.

Therapy Services for Children under Twenty-One

Effective January 1, ND Medicaid will implement annual limits on therapies for members age twenty and under. The limits are:

- Physical Therapy – 75 units
- Occupational Therapy – 75 units
- Speech Language Pathology – 75 units

For members who exceed the limits, a service authorization must be submitted to ensure medical necessity. The limits will apply to all Occupational Therapy, Physical Therapy, and Speech Language Pathology services.

Therapy Services for Members age Twenty-One and Over

Effective January 1, ND Medicaid will implement new annual limits on therapies for members age twenty-one and over. The limits are:

- Physical Therapy – 60 units
- Occupational Therapy – 60 units
- Speech Language Pathology – 30 units

For members who exceed the limits, a service authorization must be submitted to ensure medical necessity. The limits will apply to all Occupational Therapy, Physical Therapy, and Speech Language Pathology services.

Impact Statement for Therapy Services

Tribal Members: Members will maintain access to therapy services, with a clear pathway to request additional care when their health conditions require it. This creates consistency and helps ensure services are focused where they are most needed.

MEDICAL SERVICES

Tribal Communities: By setting a consistent standard for therapy services, these changes will help improve program stability and predictability while still allowing flexibility for members with higher needs.

Tribal Providers: The limits will apply to all Occupational Therapy, Physical Therapy, and Speech Language Pathology services provided at all facilities, including IHS, schools, and private providers. Providers may need to guide members and families through the medical necessity process.

Correct Coding Initiative

North Dakota Medicaid follows the National Correct Coding Initiative (NCCI) Edits. These edits were developed by the Centers for Medicare and Medicaid Services (CMCS) based on coding conventions defined in the American Medical Association's Correct Procedure Terminology Manual, national and local policies and edits, coding guidelines developed by national societies, analysis of standard medical and surgical practices and a review of current coding practices. CMS annually updates the Medicaid NCCI Policy Manual and the Medicaid NCCI Technical Guidance Manual. For more information go to <https://www.medicaid.gov/medicaid/program-integrity/national-correct-coding-initiative-medicaid/index.html>

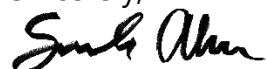
Please send comments, questions or concerns about the proposed State Plan Amendments or waivers to:

North Dakota Department of Health and Human Services
Attn: Monique Runnels
Medical Services Division
600 East Boulevard Avenue, Department 325
Bismarck, ND 58505
Fax: 701-328-1544
E-mail: mrunnels@nd.gov

Input will be accepted through 5 PM, Central Time, Monday, September 29, 2025.

The Department appreciates the continued opportunity to work collaboratively with tribal partners to support health and advance the foundations of well-being for North Dakota Medicaid members.

Sincerely,



Sarah Aker

Executive Director

Medical Services Division

North Dakota Department of Health and Human Services