



**STATE OF WASHINGTON
HEALTH CARE AUTHORITY**

626 8th Avenue, SE • P.O. Box 45502 • Olympia, Washington 98504-5502

September 25, 2025

Dear Tribal Leader:

SUBJECT: Opioid Treatment Program provider oversight

In accordance with chapter 43.376 RCW and the Washington State Centennial Accord of 1989, regarding collaboration with Indian tribes in the development of policies, agreements, and program implementation that directly affect Indian tribes and the Tribal Consultation and Communication Policy of the Health Care Authority (HCA); the HCA shares the following update regarding a new monitoring plan for Washington's Opioid Treatment Programs (OTP) .

Purpose:

HCA is in the process of implementing a corrective action plan with the Centers for Medicare and Medicaid Services (CMS) for deficiencies identified during an Health and Human Services-Office of Inspector General (HHS OIG) audit of Washington's non-Tribally owned and/or operated OTPs. The OIG audit was published in 2024 and a copy of the report is available [here](#).

The federal government implemented changes to the federal code in 2024 related to OTP provider regulations. The federal rule changes for OTPs were first published and went into effect on April 2, 2024, with a federal compliance date of October 2, 2024. HCA partnered with the Washington State Department of Health to revise state rules for OTP facilities, to align them with the new federal regulations. The new state rules went into effect in February of 2025.

Once recently updated State and Federal rules for OTP providers have gone into effect and are being utilized by OTP providers and reflected within Medicaid enrollee health records, HCA will implement a monitoring plan. The monitoring plan consists of conducting OTP patient chart reviews for all OTPs operating in the state to assess providers for compliance with the new federal regulations and state rules, specifically as they relate to the regulatory findings of the OIG audit referenced above.

HCA invites Tribal partners to attend a listening session with HCA for the purpose of gathering feedback on the provider monitoring tool and process that HCA will implement for its provider monitoring plan for all OTP providers in WA State. HCA will also seek feedback on its proposed timeline to begin monitoring tribally owned and/or operated OTP providers by the third quarter of 2026. **This HCA listening session will be held on Wednesday, October 15th from 3pm to 4:30pm on Zoom: <https://us02web.zoom.us/j/81696794246>.**

Following the listening session, HCA will send out separate correspondence to all OTP providers operating in Washington to provide this information.

Pertinent Background Information

In August 2024, the Office of the Inspector General (OIG) concluded an audit of Washington's non-Tribally owned and/or operated OTPs. The audit found widespread documentation issues with all the providers reviewed and CMS requires HCA to create and implement corrective action for the identified deficiencies. The report is available [here](#).

The audit results underscore the importance of both thorough and regulatory compliant documentation in OTP patient records, as it reflects patient needs, justifies treatment decisions, and enables continuity of care by others. Thorough OTP patient record documentation also ensures Washington OTPs can meet federal compliance standards necessary so that we can continue to receive the federal funding that allows us to provide this crucial care to patients. For more information regarding the forthcoming OTP program monitoring by HCA, and feedback on the new federal and state OTP providers rules, please contact, Jessica Blose, Opioid Treatment Authority by email at jessica.blose@hca.wa.gov.

Please contact Aren Sparck, HCA Tribal Affairs Administrator, at aren.sparck@hca.wa.gov if you have any Tribal affairs-related questions.

We look forward to working with you and receiving your feedback at the Listening Session on Wednesday, October 15th.

Sincerely,

A handwritten signature in blue ink that reads "Charissa Fotinos MD, MSc".

Charissa Fotinos, MD, MSc
Medicaid and Behavioral Health Medical Director

cc: Ryan Moran, Director, EXO, HCA
Aren Sparck, Tribal Affairs Administrator, OTA, HCA
Christine Winn, Deputy Tribal Affairs Administrator, OTA, HCA
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