

|                 |                                                                                                      |
|-----------------|------------------------------------------------------------------------------------------------------|
| <b>To:</b>      | <b>Clients and Friends</b>                                                                           |
| <b>From:</b>    | <b>Manatt Health Strategies</b>                                                                      |
| <b>Date:</b>    | <b>August 7, 2026</b>                                                                                |
| <b>Subject:</b> | <b>New York Medicaid Revalidation, Provider Services Portal and Temporary Enrollment Moratoriums</b> |

In April, the Centers for Medicare & Medicaid Services (CMS) directed every state to revalidate Medicaid-enrolled providers within an accelerated 24-month window rather than the standard five-year cycle. The New York State Department of Health (DOH) submitted its revalidation plan and on July 27, 2026, received approval. As a result, the state is issuing revalidation notices in phases and now requires all enrollment and revalidation activity through a new Provider Services Portal (PSP). In addition, as described more fully in this memorandum, **New York State is implementing temporary, six-month enrollment moratoriums for specified provider classes**. During an August 6, 2026, webinar, DOH stated the moratoriums are effective immediately. As a result, affected providers, investors and transaction parties should assess whether pending or planned Medicaid enrollments, changes of ownership (CHOWs), revalidations or maintenance filings may be delayed or require additional planning.

## **A. What Changed: A Two-Year Statewide Revalidation Initiative by Provider Risk Level**

Federal regulation has long required periodic Medicaid provider revalidation.<sup>1</sup> In April 2026, CMS directed all states to submit plans to revalidate every Medicaid-enrolled provider within a 24-month period, rather than the standard five-year cycle. DOH emphasized during the August 6 webinar that revalidation is a routine program integrity and compliance activity, and that receiving a revalidation notice does not indicate suspected fraud, waste, abuse or other wrongdoing.

The timeline in New York's approved plan requires significantly accelerated revalidation of more than 240,000 Medicaid-enrolled providers over a 24-month period beginning in July 2026 and continuing through June 2028. DOH will issue revalidation notices in phases by mail and email using the provider contact information on file. Providers should not initiate revalidation until they receive a formal notice from DOH or eMedNY but should use the interim period to confirm enrollment records, contact information, NPIs, ownership disclosures, service locations and PSP access readiness.

---

<sup>1</sup> [42 C.F.R. § 455.414](#) Revalidation of Enrollment

## **Screening Requirements by Risk Level**

As part of the State's CMS-approved revalidation strategy, New York has revised provider risk classifications and established new revalidation schedules that vary based on the level of program integrity oversight required.

- **Limited-risk:** Standard screening, including: identity, credential, location and National Provider Identifier (NPI) validation; revalidated every five years.
- **Moderate-risk:** Standard screening plus pre- or post-enrollment site visit; revalidated every four years.
- **High-risk:** Standard screening, site visit, and all of the above plus fingerprinting and background checks for all owners of 5% or more; revalidated every three years.

Individual providers can have their risk level elevated if they meet specific triggers (e.g., payment suspension, OIG exclusion/reinstatement, billing anomalies, change of ownership).

## **B. The Provider Services Portal (PSP) Is Now the Primary Enrollment Platform**

The State has completed its transition to the Provider Services Portal (PSP). The PSP consolidates new enrollment, revalidation, reinstatement and file-maintenance activity into one web-based system and is now the primary enrollment platform. DOH reported during the August 6 webinar that PSP applications are being processed in under 20 days, compared with approximately 90 to 120 days under the prior paper process. Providers can also use the PSP to view their risk-level information through the PSP.

To complete revalidation through the PSP, providers must have an NPI and access the system through an [NY.gov Business Account](#). Credentialing staff may assist with preparing applications and uploading documentation, but only the provider, owner or duly authorized representative identified on the enrollment record may electronically sign and submit the application.

## **Access and Submission Requirements**

To complete Medicaid enrollment, revalidation, reinstatement, or provider maintenance activities through the PSP, providers must establish the appropriate account access, link and verify their enrollment records, and comply with the State's electronic submission and signature requirements.

Set forth below are the steps to interface with the PSP portal.

- **Create an [NY.gov Business Account](#).** This applies to individual practitioners as well as organizations, groups, authorized representatives and credentialing staff.
- **Link an existing enrollment record.** Enrolled providers receiving a revalidation notice will receive a PIN to connect the converted enrollment file to their PSP account. Providers entering the PSP for an as-needed maintenance transaction may request a regenerated PIN.

- **Confirm the converted record.** Registration links the user's identity to the electronic enrollment record. For limited-risk providers, reviewing, updating and recertifying that record may satisfy revalidation.
- **Observe signature controls.** Credentialing staff may enter information and upload documents, but only the practitioner, owner or duly authorized representative disclosed on the record may e-sign and submit.
- **Complete new enrollment applications within 45 days.** If an application is not submitted within that period, it will be deleted and must be restarted.
- **Do not permit offshore access.** The May 2026 transition notice states that offshore credentialing personnel are not permitted to access State systems under applicable New York State data-access policies.

## C. Temporary Enrollment Moratoriums

CMS approved the temporary six-month enrollment moratorium on July 27, 2026, and DOH stated during the August 6 webinar that the moratoriums are effective immediately. The moratorium applies to the following provider classes:

- Laboratories
- Durable medical equipment, prosthetics, orthotics and supplies providers
- Applied behavior analysis providers
- Licensed home care services agencies
- Pharmacies
- Managed long-term care plans, including Medicaid Advantage Plus and PACE organizations

It is important to highlight that there is an existing federal moratorium on Medicare enrollment for new home health agencies (HHAs) and hospice providers. CMS previously enacted a temporary, six-month nationwide enrollment moratorium starting May 13, 2026, freezing new Medicare enrollments for HHAs and hospice.<sup>2</sup>

### **What the Moratorium Pauses**

DOH stated that no new enrollment applications or CHOW applications in the affected provider classes will be processed during the six-month moratorium period, including pending applications regardless of their current stage of review. Pending applications will be frozen. When processing resumes, some applications may continue as submitted, while others may require supplemental information if category of service (COS) specific requirements or related documentation standards change during the moratorium.

---

<sup>2</sup> [Federal Register:: Medicare, Medicaid, and Children's Health Insurance Programs: Announcement of Nationwide Temporary Moratoria on Enrollment of Home Health Agencies \(HHAs\)](#)

## What Remains Unaffected

Providers already enrolled in Medicaid remain enrolled and should proceed with revalidation when notified. **DOH indicated that the moratorium does not directly stop Certificate of Need (CON) review, although a provider receiving CON approval may be unable to complete Medicaid enrollment until the applicable moratorium ends.**

## Social Adult Day Care

Social adult day care programs are not Medicaid-enrolled providers. DOH stated that managed long-term care plans will receive instructions imposing a moratorium on new contracting or credentialing arrangements with social adult day care programs during the same period.

## **D. Recommended Near-Term Actions**

Providers should use the transition to the PSP and the statewide revalidation initiative as an opportunity to review and update their Medicaid enrollment infrastructure. Near-term steps include inventorying enrollment records, NPIs, ownership disclosures, managing employee information, service locations and provider contact information; confirming that mailing and email addresses on file with eMedNY are current; ensuring that providers, authorized representatives and credentialing personnel have the necessary NY.gov Business Accounts; and assigning responsibility for monitoring revalidation notices, PINs and other DOH or eMedNY communications.

Providers and transaction parties should also evaluate how the temporary moratoriums may affect pending or planned enrollments, CHOWs, acquisitions, affiliations, management arrangements and other ownership or control changes. Transaction documents may need to address Medicaid enrollment dependencies, regulatory approval conditions, outside dates, interim operating obligations, purchase price adjustments and termination rights. Providers should continue to monitor DOH and eMedNY guidance for updated screening requirements, FAQs, training opportunities, access-to-care exceptions and any extensions or modifications to the moratoriums.

## **E. Training and Support Resources**

To assist providers with compliance and implementation efforts, DOH and eMedNY have made a variety of training, support and educational resources available, including portal guidance, account setup instructions, training opportunities and technical assistance.

- **NYS Medicaid Provider Services Portal:** Portal access, user guides, quick-reference materials and PSP resources.
- **eMedNY Provider Training Schedule:** Live training and educational offerings.
- **NY.gov ID Account Overview:** Instructions for establishing the required NY.gov Business Account.
- **eMedNY Email Alert System:** Enrollment for DOH and eMedNY updates.
- **eMedNY Help Desk:** 1-800-343-9000, Option 2, then sub-option 2 for PSP questions.



DOH also announced weekly office hours for individual practitioners on Mondays from 12–1 p.m. and for organizations, groups and credentialing staff on Thursdays from 10–11 a.m. during August through October 2026, subject to extension.

**F. Manatt’s Experience and Guidance**

Manatt Health’s professionals have extensive experience guiding providers through New York Medicaid enrollment, revalidation and change-of-ownership processes. Our team supports organizations in preparing compliant submissions, addressing historical enrollment data issues, evaluating transaction-related enrollment implications, and navigating transitions between legacy systems and new state platforms.

\*\*\*

If you have any questions about the new PSP, revalidating in the NY Medicaid program, or the moratorium, generally, please reach out to a member of the Manatt team.