

Thanks for the opportunity to review. comments are below:

Section 9, Subsection E regarding practitioners. Statement "All practitioners must be enrolled as a MAD provider." This is unrealistic and ineffective. Interns are commonly only on site for about 3-6 months. Requiring a MAD provider number will take a minimum of 30 days. Use of the U7 modifier, as previously directed by state, is recommended.

Section 13, Subsection A: The Department is adding provider types to who can be the identified prescriber on the team, NOT who can be the Lead. Text states "Previously, the team leader was required to be a psychiatrist." This is not accurate. Previously, the prescriber for the team was required under MAD rules to be a psychiatrist.

Section 14, Subsection B: Removing requirement for updated assessment. This is appropriate and removes a probable violation of parity.

Thanks,

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