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October 6, 2026

On August 21, 2026, the Pennsylvania Department of Human Services (DHS) issued a reminder regarding **Off-Cycle Revalidation of High-Risk Providers**.

All providers must revalidate the Medical Assistance (MA) enrollment of each service location every 5 years. Providers should log into PROMISe to check the revalidation dates of each service location and submit revalidation applications at least 60 days prior to the revalidation dates. Enrollment (revalidation) applications may be found at:Provider Enrollment Documents | Department of Human Services | Commonwealth of Pennsylvania.

All providers categorized as high-risk who revalidated prior to July 1, 2025, and select providers categorized as high-risk who revalidated on or after July 1, 2025, that they are required to revalidate again no later than **December 31, 2026**, to remain enrolled in the Medical Assistance (MA) Program. For your convenience, the newly released DHS bulletin is attached below and can also be found by using the DHS Bulletin Search. Please review this bulletin thoroughly and ensure familiarity with these requirements.

If you have questions or concerns regarding this you may contact Provider Representative directly or reach out to us at PHWproviderrelations@pahealthwellness.com.

Thank you for your continued partnership in serving PA's CHC Participants.

PA Health & Wellness

Pennsylvania
Department of Human Services

# Medical Assistance BULLETIN

| ISSUE DATE | EFFECTIVE DATE | NUMBER |
|---|---|---|
| August 21, 2026 | August 21, 2026 | 99-26-06 |

| SUBJECT | BY |
|---|---|
| Off-Cycle Revalidation of High-Risk Providers | Sally A. Kozak<br>Deputy Secretary<br>Office of Medical Assistance Programs |

**IMPORTANT REMINDER:** All providers must revalidate the Medical Assistance (MA) enrollment of each service location every 5 years. Providers should log into PROMISe to check the revalidation dates of each service location and submit revalidation applications at least 60 days prior to the revalidation dates. Enrollment (revalidation) applications may be found at: https://www.pa.gov/agencies/dhs/resources/for-providers/provider-enrollment-information/provider-enrollment-documents.

## PURPOSE:

The purpose of this bulletin is to advise all providers categorized as high-risk who revalidated prior to July 1, 2025, and select providers categorized as high-risk who revalidated on or after July 1, 2025, that they are required to revalidate again no later than December 31, 2026, to remain enrolled in the Medical Assistance (MA) Program.

## SCOPE:

This bulletin applies to all MA enrolled providers categorized as high-risk providers.

## BACKGROUND:

On April 23, 2026, the Department of Human Services (Department) received a request from the Centers for Medicare & Medicaid Services (CMS) to undertake a swift revalidation of high-risk providers and to submit, within 30 days, a comprehensive two-year revalidation strategy to combat fraud, waste, and abuse. This includes the adoption of more frequent revalidation intervals for providers and provider types designated in the “high” categorical risk level (42 CFR 455.450) and providers who have not been screened within the past twelve (12) months for near-term revalidation.

On May 7, 2026, the Department notified CMS that it would review its revalidation strategy and undertake a swift revalidation of high-risk providers. On June 5, 2026, the Department submitted its comprehensive plan to CMS, which outlined its proposed

methodology and timeline for the completion of off-cycle provider revalidation of high-risk provider types. The plan requires revalidation of all high-risk providers and provider types enrolled in the MA Program by December 31, 2026.

**DISCUSSION:**

In response to the request from CMS, the Department has developed a plan to undertake a swift revalidation of high-risk providers. Providers that meet one of the criteria below are identified with a high categorical risk level, and are therefore deemed high-risk providers, for purposes of provider screening:

- Providers on which the Department has imposed a payment suspension based on a credible allegation of fraud, waste or abuse. The provider's risk remains "high" for ten (10) years beyond the date of the payment suspension;

- Providers that have been excluded by the United States Department of Health and Human Services, Office of Inspector General from participation in Medicare or another state's Medicaid or Children's Health Insurance Program within the last ten (10) years;

- Providers that have an outstanding overpayment due to the Department that is greater than $1,500 and is more than 30 days old, have not repaid the overpayment at the time the application was filed, are not currently appealing the overpayment and do not have an approved extended repayment schedule for the entire outstanding overpayment. Providers will continue to be categorized as high-risk until the overpayment is repaid; or

- Providers that apply for enrollment in the MA Program within six (6) months after a federally imposed moratorium for the particular provider type has been lifted by CMS.

- Providers enrolled as a Human Milk Bank (Provider Type (PT) 25, Specialty (Spec) 256) and as Diabetes Prevention Program (PT 55, Spec 223).

**PROCEDURE:**

Providers identified as high-risk must revalidate their MA enrollment prior to December 31, 2026, to continue their enrollment in the MA Program. Providers who must revalidate prior to the December 31, 2026, deadline will receive individual communication from the Department to their enrolled email address on their provider file.

High-risk providers must submit a revalidation application by the due date indicated on their 90-day and 30-day revalidation notices. Providers who fail to complete revalidation by the due date specified in the revalidation notices will have their high-risk provider service location closed in PROMISe™.

The next revalidation date for providers identified as high-risk will be December 2028. These providers will then shift to a five-year revalidation cycle, even if they continue to be

identified as a high-risk provider. The Department will send out 90-day and 30-day revalidation notices to these providers to notify them of their next revalidation due dates. Providers are reminded to ensure their contact information on their provider file is current. Providers can also log into PROMISe™ to check their next revalidation date for all enrolled service locations.

**RESOURCES:**

ACA Information for Providers: https://www.pa.gov/en/agencies/dhs/resources/for-providers/aca-for-providers.html

Medicaid Provider Enrollment Compendium: https://www.medicaid.gov/medicaid/program-integrity/downloads/mpec.pdf