



## MEMORANDUM

**To:** Mainstream Medicaid Managed Care Plans, Health and Recovery Plans (HARPs), and HIV Special Needs Plans (HIV SNPs)

**From:** New York State (NYS) Office of Mental Health (OMH)

**Date:** December 11, 2025

**Subject:** Reimbursement for Long-Acting Injectables

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Dear Health Plan Administrators,

Effective April 1, 2023, the pharmacy benefit was carved out of Medicaid managed care. This memorandum is being sent to clarify the Mainstream Medicaid Managed Care Plans, HARPs, and HIV SNPs (collectively referred to as “MMCPs” herein) reimbursement responsibility regarding Long-Acting Injectables (LAIs) in OMH-licensed outpatient programs<sup>1</sup>, and to clarify how OMH providers should bill for LAIs. Please note, the pharmacy benefit transition was not applicable to Medicaid Advantage Plus (MAP) plans.

### **MMCP Responsibility for Physician Administered Drugs at OMH-Licensed Outpatient Facilities**

The pharmacy benefit transition included outpatient drugs and other products covered under the Medicaid Pharmacy Program, such as outpatient prescription and over-the-counter drugs, and diabetic, incontinence and other medical supplies. It did not include physician administered drugs, including LAIs (J-Codes, and Sublocade codes Q9991, Q9992). LAIs, when administered by a physician or other practitioner in an OMH-licensed outpatient setting and billed on the professional claim form (1500 or 837P), continue to be covered by the member's managed care plan.<sup>2</sup>

MMCPs remain responsible for all activities necessary to support their enrolled members' care coordination and claims payment for non-outpatient pharmacy services, and related activities, consistent with contractual obligations as outlined in the [Scope of Benefits](#) and [Medicaid Pharmacy Benefit Transition to FFS: Post-Transition Roles & Responsibilities](#) guidance.

More information regarding what drugs and products are included in the NYRx Medicaid Pharmacy Program can be found within the [NYRx, the Medicaid Pharmacy Program | NYRx Preferred Drug Lists](#).

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<sup>1</sup> For list of applicable OMH-licensed programs please see Section B. Government Rates of the [Medicaid Managed Care Behavioral Health Billing and Coding Manual](#).

<sup>2</sup> If the OMH-licensed provider has the pharmacy deliver the LAIs directly to the agency, the pharmacy would bill FFS and the administration of the LAI would be billed to the enrollee's Medicaid Managed Care Plan. See section *Pharmacy Dispensing of Drugs That Require Administration by a Practitioner* in the [Pharmacy Policy Guidelines](#).

## How to Submit Claims

For LAI psychotropic drugs (e.g., naltrexone or antipsychotic agents), claiming procedures depend on whether or not the outpatient OMH-licensed program pays for the drug, and if the injection is given as part of another CPT coded service:

- a. When the provider does not pay for the drug, the program must submit the injection procedure code using a professional claim – 837P – (same as institutional but without a rate code), without a J-code or Q-code.
- b. When the program pays for the drug, the appropriate J-code or Q-code for the drug and the injection procedure code are submitted using the same 837P professional claim.
- c. If the injection is administered as part of a E&M CPT coded service, the CPT code 96372 should not be billed and only the J-code or Q-code for the drug would be claimed on the 837P if the agency pays for the drug, per above, with the appropriate other E&M/HCPCS code submitted on the 837I claim form.
- d. If a qualified staff (MD, NP, RN, PA) prepares, administers, manages, and monitors the injection of an intramuscular drug AND provides consumer education related to the use of the drug, spending at least 15 minutes with the client, then clinics can use HCPCS H2010 – Injectable Psychotropic Medication Administration with Monitoring and Education. When claiming H2010, the clinic cannot claim 96372 on the professional claim on the same day for the same client.

MMCPs must ensure systems are configured in alignment with the expectation to reimburse for practitioner/physician-administered LAIs delivered in outpatient OMH-licensed facilities.

Please note: This document is only being transmitted electronically. No hard copy will be forthcoming. If you have any questions regarding these changes, please contact OMH Managed Care by phone at 518-402-2822 or by email at [BHO@omh.ny.gov](mailto:BHO@omh.ny.gov) (MMCP inquiries) or [OMH-Managed-Care@omh.ny.gov](mailto:OMH-Managed-Care@omh.ny.gov) (provider inquiries).