

2025 Provider Moratorium Frequently Asked Questions

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Translations: [اللغة العربية](#), [English](#), [Русский](#),
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What is the provider moratorium? What applications are affected by the moratorium?

The moratorium is a temporary pause on certifying and endorsing new Community Living Supports Standard Model Agencies and 24-hour residential providers and sites in Oregon. The Federal Centers for Medicare & Medicaid Services (CMS) authorized the moratorium at ODDS' request.

During the moratorium, ODDS will close all backlogged applications and will not accept new applications for the following:

- Community Living Supports Standard Model Agencies (SMA)
- New 24-hour residential provider agencies
- New homes for existing 24-hour residential providers
- New SMA endorsements of existing provider agencies

If you're a prospective provider who was waiting on a submitted application for one of the items listed above, you can reapply after the moratorium ends. ODDS Licensing sent you direct communication. If you did not receive this communication, please contact us at dd.licensing@odhsoha.oregon.gov.

When does the moratorium go into effect? How long will it last?

The moratorium starts on June 2, 2025. CMS approved a six-month moratorium. It is scheduled to end Dec. 2, 2025. There is a possibility the moratorium may be extended. ODDS leadership will keep partners updated at meetings. If there are changes to our plan, we will communicate this to our partners and the community. We will also post updates on our [Prospective Providers web page](#).

Why is ODDS doing this?

- To decrease the risk of fraud, waste and abuse
- To ensure providers' compliance and people's safety
- To improve the quality of I/DD services and customer support
- To make sure individuals have choices from a strong continuum of services and settings to meet their needs
- To update our rules related to provider types affected by the moratorium
- To make our work and the work of case management entities toward these goals more effective

What was the process to get the moratorium approved?

On Jan. 10, 2025, ODDS and Oregon Health Authority (OHA) submitted the moratorium application and the Access to Care Summary and Analysis to CMS. In early February, CMS responded with feedback:

- They would not allow for an exceptions process for any new providers or settings subject to a moratorium.
- They also would not allow ODDS to process backlogged applications for provider types subject to a moratorium.

Later in February, ODDS met with provider organizations, such as the Community Providers Association of Oregon, Oregon Resource Association and Oregon Association of Provider Agencies, to discuss the feedback and adjustments CMS requested. ODDS then consulted CMS about some concerns, such as how the moratorium would affect the ability of existing providers to open new 24-hour residential sites. In mid-March, CMS responded with clarifications, including that a moratorium would pause the licensing of all new 24-hour residential sites. ODDS again consulted with provider organizations before making the decision to proceed.

ODDS and OHA submitted their revised application materials to CMS on April 21, CMS granted us their approval on May 14. ODDS immediately prepared communications. [We informed our partners and the public](#) on May 19, 2025: The moratorium will start June 2, 2025, and last for six months.

What is the difference between agency certification and a 24-hour residential license?

Agency certification:

- This certification allows one to provide various endorsed services.
- To apply, a prospective provider agency fills out the ODDS Agency and Endorsement Application.

24-hour residential license:

- This license is site specific. An agency must first be certified and endorsed as a 24-hour residential provider agency before opening a site location.
- To apply, a certified provider agency fills out a 24-Hour Residential Home Application for each site.

Can ODDS make exceptions to the moratorium?

There are no exceptions. The CMS did not allow exceptions to the moratorium. We proposed an exceptions process in our January application. In February, CMS told us exceptions are not possible during the temporary pause. CMS explained that it is fairer to apply the moratorium to everyone equally. They also explained that processing exceptions could conflict with the goal of reducing fraud, waste and abuse.

Will the moratorium affect individuals who get services?

The moratorium won't make it harder for anyone to get services. We have many 24-hour residential providers in the state. As of May 2025, these providers had about 900 openings. This is far more than current demand. The moratorium does not stop current SMA providers from hiring more direct support professionals to meet individuals' needs.

How will ODDS make sure people in these communities have access to providers?

We'll review vacancy data monthly for emerging trends. We'll report to CMS on this monthly. If there are individual situations where SMA and 24-hour providers

are needed, we'll help case management entities find providers for those in need.

Does it matter what county I'm in?

No. The moratorium is statewide.

Will ODDS refund my application fee(s) for my closed applications(s)?

Yes. We're working with the Office of Financial Services to ensure fees are reimbursed for applications that have been closed due to the moratorium. We hope to deliver reimbursements within 90 days of June 2, 2025.

If I received my agency certification, but my 24-hour residential home application was closed, do I need to go through the agency certification process again?

No. If you're already a certified agency and your 24-hour residential home application was closed, you maintain your agency certification until its expiration date.

I'm a certified agency, but my 24-hour residential license application is being closed. I'm not currently providing other endorsed services. Am I required to maintain insurance during the moratorium?

If your agency does not have other endorsements nor any licensed 24-hour residential sites, you are not required to maintain active insurance for licensing or certification purposes. You must have insurance prior to licensing any site. We recommend consulting with your insurance agent to determine the best course of action for your agency.

What happens if my agency certification expires during the moratorium?

The moratorium does not impact renewals for any existing provider type. Six months prior to expiration ODDS Licensing will send you an email with your

renewal application packet and relevant information to renew. To remain certified, you must follow the agency renewal certification process. This includes sending your ODDS Agency and Endorsement Application to the ODDS Licensing Unit before your expiration date.

If I went through the Medicaid Agency Orientation (MAO) already and received my certificate, do I need to go through that orientation again before I reapply once the moratorium ends?

No. If you received your MAO certificate, it will still be valid when you reapply after the moratorium ends.

Can I request changes to my certified agency?

Each situation is unique. Please contact ODDS Licensing with any legal entity changes, name changes, and ownership or executive director changes, so we can assist you.

Can ODDS continue to process backlogged applications during the moratorium?

No. In our initial request for the moratorium, we planned to process all backlogged applications. We'd hoped the temporary pause would help us catch up, but CMS did not permit this in the approved moratorium. This means:

- For new agency providers, all backlogged applications will close on June 2, 2025.
- For new 24-hour residential site applications, we can only finish processing applications for new homes that have a completed final walkthrough by June 2, 2025. At that time, all remaining applications will close.

All providers whose applications are closed can reapply after the moratorium ends.

My 24-hour residential home application was processed and in the queue for a walkthrough, but I received an email that my application was closed. Is it really closed?

Yes, your application is closed as a result of the moratorium. You can reapply after the moratorium ends. More than 350 backlogged 24-hour applications will not have a walkthrough before the moratorium takes effect June 2, 2025. These applications will be closed and application fees returned. Providers can reapply after the moratorium ends.

Can existing agencies open new homes during the moratorium?

No. CMS did not approve a moratorium that allowed for exceptions.

We proposed an exceptions process in our January application. In February, CMS told us exceptions are not possible during the temporary pause. CMS explained that it is fairer to apply the moratorium to everyone equally, including existing providers seeking to expand services. They also explained that processing exceptions could conflict with the goal of reducing fraud, waste and abuse.

Can I transfer my current 24-hour residential license to a new site address?

No. We do not “transfer” or do “change of addresses” for 24-hour residential licenses because each license is site specific. A transfer requires submitting a new 24-hour residential home application for the new site. However, due to the moratorium we are not accepting new applications of this type.

If I am a current foster home provider, can I apply to convert my foster home to a 24-hour home?

No. This process requires submitting both of the following:

- 1) The ODDS Agency and Endorsement Application with a 24-hour endorsement, and
- 2) The 24-Hour Residential Home Application.

Both of these are subject to the moratorium.

Can I request a change in the age range or capacity for my currently licensed 24-hour residential home?

Yes. You will need to submit an Amendment Change Form to request that change. Please contact ODDS Licensing to request a form.

Does the moratorium affect the implementation of Agency with Choice directed in Senate Bill 1521?

No. ODDS is still moving forward with developing Agency with Choice by Jan. 1, 2026.

Will ODDS make rule changes to address current challenges that results in the moratorium?

We want to ensure that we have experienced, qualified providers who deliver quality services. We seek a larger solution that prevents a backlog of applications in the future. To do this, we will make rule changes. We'll be adopting temporary emergency rules focused on quality, access and safety. After this, we'll host Rules Advisory Committees for permanent rule changes. We'll post information about these changes on our [Engagement and Innovation web page](#).

How do I ask questions or get more information?

ODDS leadership will keep partners updated at meetings. If there are changes to our plan, we'll send another community message. We'll post the most current information on our [Prospective Providers web page](#).

If you have questions, please email dd.licensing@odhsoha.oregon.gov.

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