Topic	Question	Answer
Common Medical Marketing Area (CMMA)		
	What is CMMA?	The Common Medical Marketing Area (CMMA) is the geographic area from which a community customarily obtains its medical care and services. The CMMA is not necessarily set by geographic or county borders. Rather, the CMMA can vary depending upon the medical specialty or services required that are accessible locally, as well as the individual needs of each enrollee
	How is CMMA calculated?	Use definition outlined on July 9, 2025, webinar slides. For Opioid Treatment Programs (OTPs), Comprehensive Outpatient Programs (COPs) and Outpatient Programs (OPs), the CMMA includes all OTP and OP facilities within the enrollee's county or borough of residence. Additionally, the CMMA also includes any OTP, COP or OP facility outside of the enrollee's county or borough of residence where the distance is less than or equal to the maximum average distance traveled to receive these services within the county or borough. Members using public transportation in NYC (or other regions of the state that utilize public transportation)

	can continue to travel to distant programs if
	they continue to use public transit.
Where can I see who has an	Log into the MAS system as shown in the July
upcoming 2020 that will expire?	9, 2025, webinar. Additionally, these files are
	sent weekly via the Health Commerce
	System (HCS).
Why doesn't the CMMA	Many variables are considered for the CMMA
measurement seem correct?	calculation. Each enrollee will have a unique
	distance based on their address in ePaces.
What is the most efficient way to	The enrollee is responsible for updating their
update this address?	address with the Local Department of Social
	Services (LDSS) and/or New York State of
	Health, Health Plan Marketplace within 10
	business days, in accordance with DSS
	policy. CMMA will be calculated based on
	the address in ePaces.
Will areas like NYC with a dense	Not necessarily the case; it depends upon
population of OTP/OP facilities limit	the patient's closest OTP, COP or OP to their
or remove one's ability to choose a	address. Then, there are three options if
program?	they're attending a program outside their
	CMMA (remain in-care without covered
	Medicaid transportation by taxi, maintain in
	the same program with use of carfare, or
	relocate to a closer program within their
	CMMA).
What happens when a provider will	If the closest provider is not able to accept a
not accept someone into their	patient or is at capacity, by default the next
program even though it's within the	available provider would be within the
CMMA?	CMMA. Transportation outside of CMMA
	requires Form 2020 to be completed by a

	referring (not receiving) provider to document
	that treatment is not available locally
	The program eaching to get a nationt into
	The program seeking to get a patient into
	another program should reach out to the
	SOTA Team (SOTA.mailbox@oasas.ny.gov) to
	let us know of any barriers to care; we can
	reach out to the program that is not
	accepting the patient to get a better
	understanding of any issue (CAVEAT: This is
	particularly important f the program was not
	afforded a reason why the other program is
	refusing to accept the patient).
•	The Common Medical Marketing Area
to a member what should I tell them?	(CMMA) is the geographic area from which a
	community customarily obtains its medical
	care and services. The CMMA is not
	necessarily set by geographic or county
	borders. Rather, the CMMA can vary
	depending upon the medical specialty or
	services required that are accessible locally,
	as well as the individual needs of each
	enrollee.
	•If the closest provider is not able to accept a
	patient or is at capacity, by default the next
	available provider would be within the
	CMMA.
	•Transportation outside of CMMA requires
	Form 2020 to be completed by a referring
	(not receiving) provider to document that
	treatment is not available locally.
_	If i need to explain what an CMMA is to a member what should I tell them?

		https://masvmwp01.medanswering.com/wp-
		content/uploads/2025/06/OTP-OP-CMMA-
		Transition-Enrollee-Information-5.29.25.pdf
	How does CMMA work with health	Generally, CMMA doesn't consider keeping
	systems that want to keep enrollees	an enrollee in a health systems network. To
	within their network of providers, but	remain complaint with CMS guidance
	those providers are outside of the	enrollees should go to the nearest qualified
	CMMA.	medical provider.
	If a patient resides in a shelter and is	CMMA is based on the enrollees address in
	relocated to a different shelter	ePaces. If an enrollee moves, they should
	outside the CMMA, do they need to	update their address to maintain receiving
	move treatment also?	
		the transportation benefit.
	What is the definition of a long	Long distance does not have a standard
	distance for MAS?	definition, and programs should refer to the
		Common Medical Marketing Area look-up
		tool within the MAS portal to determine
		which programs are within the member's
		CMMA.
		For OTPs, COPs and Ops, the CMMA includes
		all OTP and OP facilities within the enrollee's
		county or borough of residence. Additionally,
		the CMMA also includes any OTP, COP or OP
		facility outside of the enrollee's county or
		borough of residence where the distance is
		less than or equal to the maximum average
		distance traveled to receive these services
		within the county or borough.
Going out of CMMA		

Are you forcing enrollees to go to an in CMMA medical provider?	No. Enrollees are transported to the patient's closest qualified medical provider. However, an enrollee may continue to go to the distant OTP if they choose to their address. Then, there are three options if they're attending a program outside their CMMA (remain in-care without covered Medicaid transportation by taxi, maintain in the same program with use of carfare, or relocate to a closer program within their CMMA).
Is there any way for patients that are outside the CMMA to remain at their assigned clinic?	This would need to be for extenuating circumstances only and considered on a case-by-case basis, should the three options still not being optimal (remain in-program without Medicaid transportation by taxi covered, utilize public transportation [if feasible], or transfer to the provider within the patient's CMMA).
In cases where our OTP provides OTP services and also addiction psychiatry, can we keep patients in our clinic when the OTP closest to home does not have the ability to provide psychiatry services? Many rural communities lack psychiatry services	This would only be considered on a case-by-case basis, should the three options still not being optimal (remain in-program without Medicaid transportation by taxi covered, utilize public transportation [if feasible], or transfer to the provider within the patient's CMMA).
What if patients are banned from receiving services from a certain location/program?	MAS will review justifications submitted on 2020-forms and determine if travel outside the member's CMMA is necessary. Any documentation that supports the

	justification, such as a court order, can be
	submitted to MAS with the 2020-form.
What if a patient only attends the	This would only be considered on a case-by-
program 1x monthly and has been	case basis, should the three options still not
with the program for numerous years	being optimal (remain in-program without
with coordination of care and	Medicaid transportation by taxi covered,
successful recovery outcomes	utilize public transportation [if feasible], or
	transfer to the provider within the patient's
	CMMA).
What if no other OTPs in the person's	There may still OTPs out there that have
CMMA will accept the person due to	providers who take a harder line (e.g., such
treatment such as opioid-based or	as a case where patients aren't accepted
benzo. based treatment? Some OTPs	based on their benzodiazepine use or other
DO not provide such important	factors). For continuity of patients' care, we
patient care	would like to ensure this would not cause the
	patient(s) from bouncing between programs
	for fear of them being lost.
-What happens if a client is refusing	This would only be considered on a case-by-
to go to any of the other programs	case basis should the three options still not
closer to them for various reasons?	being optimal (remain in-program without
Such as - it could be a risk/triggering	Medicaid transportation by taxi covered,
for them to be there	utilize public transportation [if feasible], or
	transfer to the provider within the patient's
	CMMA).
What about OP clinics that offer MH	A regular 2020-form can be submitted when
services that are out of the areas?	ongoing treatment from a program outside
	the member's CMMA is clinically necessary.
	The 2020-form must be completed by a
	referring provider and cannot indicate a
	referral to the provider's own program. MAS
	will determine when the submitted 2020-
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How does it work if a patient has unstable housing?	form can be approved based on the submitted justification. CMMA is based on the enrollee's address in ePaces. If an enrollee moves, they should update their address to maintain receiving the transportation benefit. The enrollee is
	responsible for updating their address with the Local Department of Social Services (LDSS) and/or New York State of Health, Health Plan Marketplace within 10 business days, in accordance with DSS policy.
Will guidance be provided to all	This would need to be considered on a case-
levels of care to ensure patients transitioning to different levels of care are staying within their CMMA. Could patients potentially wait to get	by-case basis, should the three options still not being optimal (remain in-program without Medicaid transportation by taxi covered, utilize public transportation [if feasible], or
into treatment (i.e. halfway houses) as many halfway houses may be out of a patient's CMMA. The county may not be changed in Medicaid for temperary housing situations.	transfer to the provider within the patient's CMMA).
If a standing order does not expire until December - is that client still	The first day (day 1) that a program should start working on transitioning a member
expected to transfer to a program in their MMA by end of July?	closer to their home differs by patient and is no earlier than July 28, 2025; Day 1 is 4 weeks prior to the expiration of patient's standing

	order for transport. Some members may want to transfer to a program closer to their home before their standing order expires and, in those cases, the program should assist the member in finding a suitable location.
What happens if the enrollee refuses to relocate to a closer provider?	There are still three options remain in- program without Medicaid transportation by taxi covered, utilize public transportation [if feasible], or transfer to the provider within the patient's CMMA.
Will there be exceptions for clients who are unable to attend a facility that is closer to them due to personal conflicts, privacy, or discharge status not being able to attend the program closest to them?	This would need considered on a case-by-case basis, should the three options still not being optimal (remain in-program without Medicaid transportation by taxi covered, utilize public transportation [if feasible], or transfer to the provider within the patient's CMMA).
Admittedly it should be rare, but what do we do if we admit a patient but then the facility we are referring to denies due to clinical concerns, not capacity? Some programs admit with more/less discretion than others.	This should be noted on a 2020 form. It will be brought to the attention of OASAS. OASAS along with DOH and MAS can collaborate on how to best proceed.
What is the process for asking for exceptions - that someone outside a zone should stay at the clinic? For example, a patient who is blind and it	MAS will review justifications submitted on 2020-forms and determine if travel outside the member's CMMA is necessary. Any documentation that supports the

	would be a severe hardship to	justification can be submitted to MAS with
	change programs.	the 2020-form.
2020 Form		
	Who completes the 2020 form?	While an enrollee is transitioning to a program within their CMMA, a "grace period 2020 Form" may be completed by their existing program that allows them to continue receiving treatment at their current out-of-CMMA program for a limited time; a grace period 2020 can be completed for a period not exceeding 60 days to ensure continuity of treatment for the member. For all non-grace period 2020 Forms, the receiving provider is prohibited from completing the NYS 2020 Form. Per DOH policy, a referring medical provider must complete a 2020 Form (found within the MAS Medical Provider Portal)
	When does the 2020 form expire?	2020 form expiration dates can be found on the enrollee profile page in the MAS system under the "Forms" tab.
	How do we know the status of a 2020 form once submitted?	The review process for the NYS 2020- Form begins once the form has been submitted, and it may take up to 7-10 business days to complete the review. A member of the MAS Utilization Review team will be in touch with you if any additional information is needed. You may also check on the status of a form under the tab labeled "Forms" on the enrollee profile in the MAS system.

Can we see why a 2020 was denied?	The status of a 2020 form will be updated for the medical provider to see in the secure MAS portal.
If a standing order does not expire until December - is that client still expected to transfer to a program in their MMA by end of July?	The first day (day 1) that a program should start working on transitioning a member closer to their home differs by patient and is no earlier than July 28, 2025; Day 1 is 4 weeks prior to the expiration of patient's standing order for transport. Some members may want to transfer to a program closer to their home before their standing order expires and, in those cases, the program should assist the member in finding a suitable location.
If a program has a waitlist, they would be required to complete all 2020 forms for the clients they cannot accept?	The receiving program with a waitlist will need to complete a 2020 indicating such.
If the closer OTP is unable to accept new patients, a new 2020 should be filed by who? The current OTP or the one that cannot accept the patient?	The 2020 would be completed by the program who cannot accept the patient. Please refer to the July 9th webinar slide deck for more information on this option (see step 5c).
If a 2020 is submitted for a simple pickup or drop off time change how long does it take for the form to be reviewed and approved?	A NYS 2020-Form is not required for a pickup or drop off time change.

Grace Period 2020 Form		
	What is a grace period 2020 form?	To continue attending their current program during the 60 days, the program must complete a 'Grace Period 2020-Form.' After 60 days, members with a need for services not available locally must have an approved 2020-Form filed for transportation to be covered. The grace period 2020 form can be
		found on the MAS medical provider portal.
	Who can complete a grace period 2020 form? How long is it good for?	While an enrollee is transitioning to a program within their CMMA, a "grace period 2020 Form" may be completed by their existing program that allows them to continue receiving treatment at their current out-of-CMMA program for a limited time; a grace period 2020 can be completed for a period not exceeding 60 days to ensure continuity of treatment for the member.
	Where is the grace period 2020 form located?	There is only one 2020-Form. When this form is submitted with the intent to extend approval for a member to travel to their current, distant program for a period of 60-days after their standing order for transportation expires, DOH and MAS think of this use as a "Grace Period 2020. Programs will select "Substance Use Disorder Treatment Grace Period" from the "Justification Reason" drop down and note in the "Justification" section of the form the timeframe (up to 60 days).

Is the grace period 2020 form different from a regular 2020 form? If we want to request transportation beyond the 60-day grace period, because it's clinically appropriate for them to stay in this specific treatment program- would we then do the regular 2020 form?	There is only one 2020-Form. When this form is submitted with the intent to extend approval for a member to travel to their current, distant program for a period of 60-days after their standing order for transportation expires, DOH and MAS think of this use as a "Grace Period 2020." In the justification reason drop down within the 2020-form, 'Substance Use Disorder Treatment Grace Period' is an option: Transportation beyond the grace period would be considered case by case. Generally, no self-referrals will be allowed past the grace period. A regular 2020-form can be submitted when ongoing treatment from a program outside the member's CMMA is clinically necessary. The 2020-form must be completed by a referring provider and cannot indicate a referral to the provider's own program. MAS will determine when the submitted 2020-form can be approved based
During Lesley's presentation, did I hear correctly that the Grace Period 2020 is ending in 2026?	on the submitted justification. No; to clarify, in Lesley's presentation, in the slide that said, "Step 6: Continue to repeat this process with all members who are traveling out of their CMMA in the four weeks prior to the expiration of the member's standing order. This process will conclude in early 2026."

Public Transit		
	We only distribute MetroCard's and use no other forms of transport; how does all of this interact with PTAR?	Members using public transportation in NYC can continue to travel to distant programs if they continue to use public transit.
Health Commerce System (HCS)		
	When we inquired with Health Commerce System to get access to the report, they weren't able to add that as of yesterday. They informed us "Your organization type does not have that role."	For questions about the HCS please contact them directly.
	What is the health commerce system?	The Health Commerce System (HCS) has been developed by New York State Department of Health (NYSDOH) as a secure system for collecting and distributing data among state entities, health facilities/providers and partners. The purpose of this document is to:
		 Describe the policy that the user of the HCS must agree to and the conditions that must be met to obtain and retain an HCS account. Enroll using the HCS User Account process to permit an HCS account to be established for a new user of the HCS.
		Describe the policy for and methods of providing an existing user of the HCS with an association to this organization.

How can we find out who is the contact you've as the appointed person for HCS? Would you be able to let us know?	Contact medtrans@health.ny.gov
Only one user is able to access Health Commerce System? Backup users will need to be identified and enrolled.	We are working on adding the ability to add additional users. You can also utilize the MAS system to see upcoming expiring 2020 forms.
How are we able to add contact person in the HCS?	Contact medtrans@health.ny.gov