

June 13, 2022
MB# 22-008

MEDICAID BULLETIN

TO: All Healthy Connections Medicaid Providers

SUBJECT: CMS Requirement for Fingerprint-based Criminal Background Checks of High-Risk Medicaid Providers

The Centers for Medicare and Medicaid Services (CMS) classifies certain types of health care providers as “high risk” and requires them to submit fingerprint-based criminal background checks (FCBC). Beginning July 2022, the South Carolina Department of Health and Human Services (SCDHHS) will proactively work with all South Carolina Healthy Connections Medicaid-enrolled providers who are categorized as high-risk to ensure they are in compliance with federal regulations. **SCDHHS will notify currently-enrolled high-risk providers who are required to submit fingerprints in writing with the actions necessary to comply with this federal requirement.**

The regulations, 42 CFR § 455.434 and 42 CFR § 455.450, require an FCBC for the “provider, or a person with 5 percent or more direct or indirect ownership interest in the provider.” **Persons required to provide fingerprints must do so no later than Aug. 15, 2022.** Failure to comply with the fingerprinting requirement will lead to termination from the Medicaid program. Providers can learn more about fingerprinting requirements, high-risk provider types, and disqualifying criteria, by visiting our provider resources page to review a [list of frequently asked questions \(FAQ\)](#). Healthy Connections Medicaid providers who are also enrolled as a high-risk provider with Medicare and comply with Medicare’s FCBC requirements will be deemed in compliance with the Healthy Connections Medicaid requirements.

Effective Aug. 15, 2022, FCBC compliance will become a requirement for providers enrolling in Healthy Connections Medicaid. Newly-enrolling and revalidating high-risk providers will be required to meet the FCBC requirements during the initial enrollment and revalidation processes. Once again, Healthy Connections Medicaid providers who are also enrolled as a high-risk provider with Medicare and comply with Medicare’s FCBC requirements will be deemed in compliance with the Healthy Connections Medicaid requirements.

SCDHHS’s goal is to continue to enhance the integrity of the Healthy Connections Medicaid program while complying with federal requirements. Providers may direct questions regarding this requirement to the Provider Service Center at (888) 289-0709. The Provider Service Center’s hours of operations are 7:30 a.m.-5 p.m. Monday-Thursday and 8:30 a.m.-5 p.m. Friday.

Thank you for your continued support of the South Carolina Department of Health and Human Services.

/s/

Robert M. Kerr