

The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
250 Washington Street, Boston, MA 02108-4619

CHARLES D. BAKER
Governor

KARYN E. POLITO
Lieutenant Governor

MARYLOU SUDDERS
Secretary

MARGRET R. COOKE
Acting Commissioner

Tel: 617-624-6000
www.mass.gov/dph

To: All BSAS Licensees and Organizations Seeking OTP Licensure

From: Deirdre Calvert, LICSW, Director of the Bureau of Substance Addiction Services (BSAS)

Date: November 2, 2021

Re: Opioid Treatment Program (OTP) New Applicant Licensing Workflow

The purpose of this memo is to provide guidance to all programs currently licensed by the Bureau of Substance Addiction Services (BSAS), as well as any organizations seeking Opioid Treatment Program (OTP) licensure, on the licensing process for OTPs. This licensing process involves several different state and federal regulatory agencies, and can be complex and challenging for new applicants for OTP licensure.

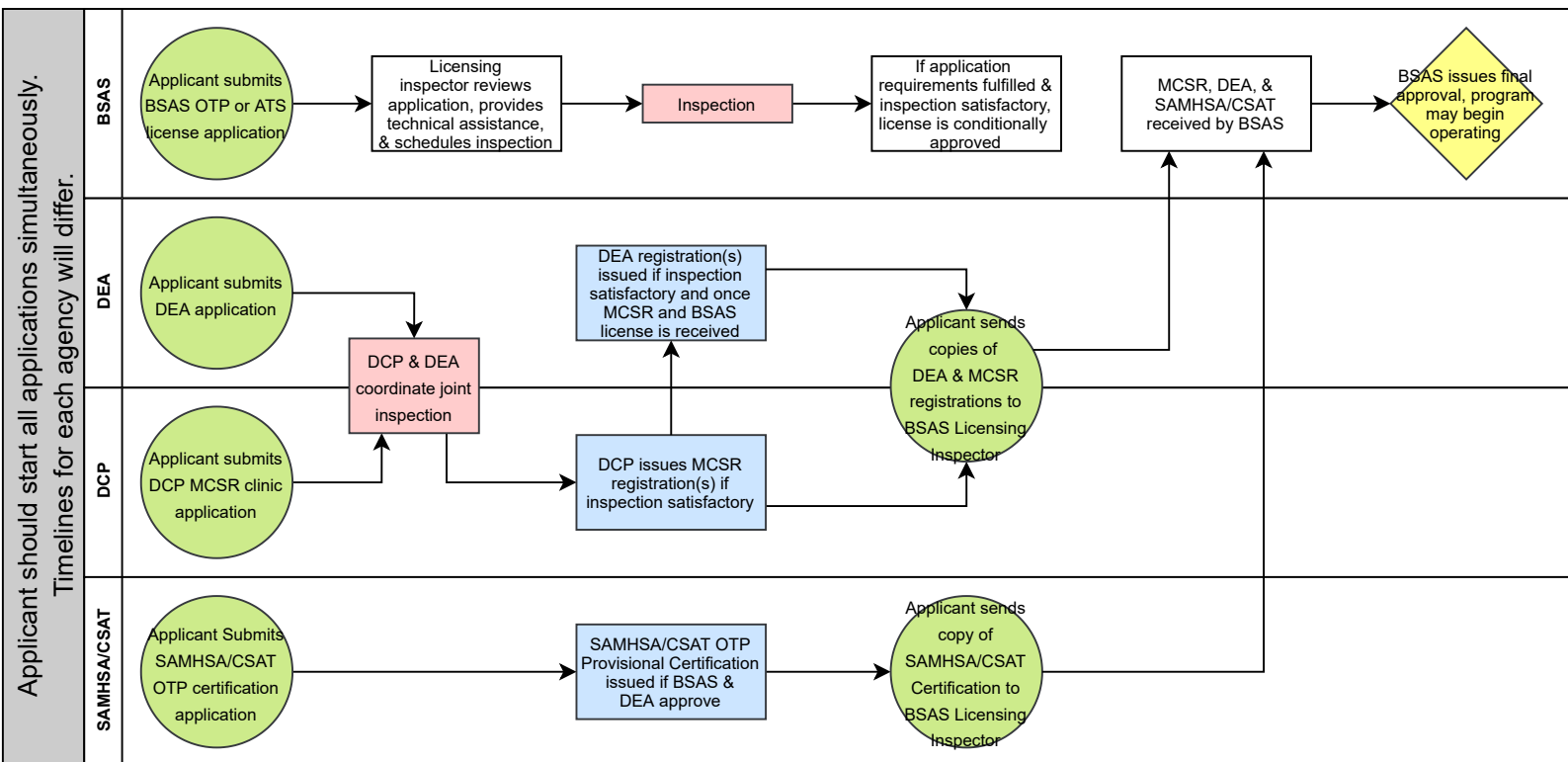
Each state/federal agency has a slightly different role or function in this licensing process, so BSAS has created the attached **OTP New Applicant Licensing Workflow** for community OTPs and federally-certified OTP Acute Treatment Services (ATS) programs. This document serves as a technical assistance tool to facilitate the licensing process and discussions between applicants, BSAS, and the other state/federal regulatory agencies involved in OTP licensure.

The OTP New Applicant Licensing Workflow shows how the licensure process unfolds for each component state/federal agency, relationships between different agencies' respective approvals/registrations, where to submit applications for the next stage of licensure/registration/approval, as well as helpful information and links to agencies' applications/information websites.

If you have any questions regarding OTP licensure, please contact Jen Babich, BSAS Assistant Director of Opioid Treatment Services, at jennifer.babich@mass.gov.

Call BSAS' Helpline at 1-800-327-5050 (8am-10pm Mon-Fri, 8am-6pm on weekends) to get information on programs and services that are best for you in your area. Go to www.helplinema.org/help for more details.

Bureau of Substance Addiction Services (BSAS) Community Opioid Treatment Programs (OTP) & Federally Certified OTP Acute Treatment Service (ATS) Programs New Applicant Licensing Workflow



Helpful Information & Links

Bureau of Substance Addiction Services (BSAS) Opioid Treatment Program & Acute Treatment Services

- Opioid Treatment Programs (OTP) are subject to all BSAS licensure requirements in 105 CMR 164 and all applicable federal laws
- For BSAS licensure regulations visit:
<https://www.mass.gov/doc/105-cmr-164-licensure-of-substance-abuse-treatment-programs/download>
- Prior to submitting an application for licensure the organization must pass Suitability per 105 CMR 164.010
- For more information visit:
<https://www.mass.gov/service-details/information-for-licensed-substance-use-disorder-treatment-programs>

Drug Enforcement Administration (DEA) Narcotic Treatment Clinic

- Application: <https://www.deaiverison.usdoj.gov/drugreg/index.html>
- Recommended to submit DEA application before the DCP application
 - Use form 363 Narcotic Treatment Clinics
 - For BSAS license number (if not provided tentatively yet), enter #0000 to be able to proceed
 - For the MCSR license number (if not provided tentatively yet), enter #0000 to be able to proceed
 - For expiration dates, enter the last date of the current year (ie 12/31/2020)
 - A reference number will be created for this application, add this number in a cover letter to DCP
 - Make sure the full address and program name matches what was used on BSAS license application

Drug Control Program (DCP) Massachusetts Controlled Substance Registration (MCSR)

- Application: <https://www.mass.gov/doc/clinic-mcsr-application-new-renewal-amended-information-0/download>
- Recommended to include cover letter with application indicating new OTP working with BSAS, have started a BSAS application
 - Include DEA application reference number

Federally Certified OTP Acute Treatment Service (ATS) Programs:

- Submit two DCP MCSR clinic applications:
- Schedule II & III (Methadone and Buprenorphine)
 - Schedules IV & VI (Comfort medications)

Community Opioid Treatment Programs:

- Submit one DCP MCSR clinic application:
- Schedule II & III (Methadone and Buprenorphine) and Schedule VI (Naloxone)

Substance Abuse and Mental Health Services Administration/Center for Substance Abuse Treatment (SAMHSA/CSAT)

- Application: <https://www.samhsa.gov/medication-assisted-treatment/become-accredited-opioid-treatment-program>
- Also known as CSAT

Workflow Legend

