

Public comment period regarding MCO network adequacy standards for independent Substance Use Disorder (SUD) labs

Background: The July 2026 transition of Substance Use Disorder billing to Managed Care Organizations (MCOs - NJ FamilyCare insurance plans) raised questions from health care providers about independent laboratory options that are part of insurance networks.

Independent labs are those that are not part of a clinic or hospital, for example. SUD lab services are used to assess and/or confirm drug use to support an individual's treatment and recovery (e.g., urine toxicology/drug screens).

Network adequacy for SUD laboratory services that are in-network with NJ FamilyCare plans is currently assessed using the two standards below. These 'network adequacy standards' are meant to ensure that members can easily access these services.

- **Access standards: 1 Provider within 15 miles of 90% of all members within the county**
- **Servicing county standards: Minimum 2 providers per servicing county (able to service each county)**

All NJ FamilyCare plans currently meet these standards, meaning their networks have been judged as 'adequate'. As the standards are currently applied today, each lab location with a unique National Provider Identifier (NPI) is counted as a separate provider.

Input requested: DMAHS is seeking public input on these network adequacy standards, particularly regarding independent SUD lab services, to help us understand whether current standards should be changed.

We ask you share your perspective on:

1. The current standards, and any changes you would recommend.
2. Whether there are specific goals DMAHS should aim for regarding network adequacy (i.e., member choice, provider choice, distance of locations from members, hours of operation, customer service, speed of results).

If you have any additional questions about these standards, feel free to include these in your comment.

To leave a comment: Send your comment as an email, word document or PDF to DMAHS.SUDLabIntegration@dhs.nj.gov. Please be sure to include your name, role (e.g., member, provider, MCO representative), and organization (if applicable). We ask you answer both 1 and 2 above.

We will accept comments between 9am October 12th and 5pm on October 26th. No late comments will be considered. All comments should be professional in nature and should not reveal confidential personal information.

Please be aware that all comments received may be posted publicly and attributed to your organization on the DMHAS website after the comment period ends as part of this process. Any publicly posted comments may be edited for brevity and privacy.

Given the volume of feedback anticipated, DMAHS will not respond to each comment individually, however every comment received will be read and considered.