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Client Alert: Ohio Tightens the Reins on Medicaid Providers – What You Need to Know About Executive Order 2026-01D

On May 18, 2026, Ohio Governor Mike DeWine signed Executive Order 2026-01D, bypassing normal rulemaking procedures to immediately amend three Ohio Administrative Code (OAC) rules governing the state's Medicaid provider enrollment oversight. The changes were effective as of May 18 and are part of the Ohio Department of Medicaid's (ODM) newfound crackdown on Medicaid fraud.

The emergency amendments to OAC rules 5160-1-17.4, 5160-1-42, and 5160-1-17.6 allow ODM to:

- **Terminate inactive providers.** Provider agreements may now be immediately terminated by ODM for any provider that has not furnished services to a Medicaid beneficiary or billed Medicaid in more than one year. Previously, ODM would only terminate providers that had not provided services or billed Medicaid for two or more years. This change means that many new providers will now find themselves at risk of termination.
- **Require more frequent revalidation.** The standard five-year revalidation cycle can now be shortened for any provider at the Medicaid director's discretion. "Higher-risk" providers identified through data analytics and targeted screening should expect to revalidate enrollment on an accelerated basis. Notably, neither the executive order nor the emergency rules define what constitutes a "higher-risk" provider.
- **Recredential providers at any time.** Similarly, the previously fixed three-year recredentialing cycle for practitioners and facilities can now be shortened at the Medicaid director's discretion whenever deemed necessary.
- **Deny applications during a moratorium.** Medicaid provider enrollment applications may now be denied by ODM while a federally approved moratorium is in effect, even if a provider submitted their application before the current moratorium began on May 13, 2026. The executive order directs ODM to immediately implement a six-month moratorium on new provider enrollments of hospice and home

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health agencies, waiver individuals and organizations, private duty nurses, and the provider-type subgroups of personal care aides and home care attendants, including denial of pending enrollment applications.

Provider Next Steps

The emergency rules will remain in effect for 120 days, and the executive order will last until 10 days after the governor leaves office.

Moving forward, providers should confirm their Medicaid provider status. With the inactivity threshold now reduced to one year, providers who have not billed within the past year are at risk of immediate termination. Providers in “higher-risk” categories should assemble credentialing and compliance documentation in anticipation of accelerated revalidation or recredentialing requests from ODM.

Ohio is moving quickly on these changes, and providers who stay ahead of Ohio’s ever-changing health care landscape will experience the least amount of disruption to their service delivery.

Please reach out to Daphne Kackloudis, Jordan Burdick or Aerin West for more information on Executive Order 2026-01D or ODM’s emergency administrative rules, or to better understand how ODM’s recent policy moves affect your Medicaid provider status.