

From: [Donna Canalizo](#)
To: [HRSA Paperwork](#)
Subject: [EXTERNAL] Information Collection Request Title: Health Resources and Services Administration (HRSA) Uniform Data System (UDS), OMB No. 0915-0193 – Revision
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Regarding the Initiation and Engagement of Substance Use Disorder Treatment CMS137v14, the Definition includes "The new SUD episode is the first encounter during the Intake Period with a diagnosis of SUD with no encounter or medication treatment for a diagnosis of SUD in the 60 days prior." This causes a problem for primary care providers in our practice due to patients who present and are diagnosed with a valid SUD diagnosis, but who should not be included in the denominator due to prior and/or ongoing SUD diagnosis and treatment external to our practice within the previous 60 day window. Additionally, most of our primary care providers do not prescribe the valid medications to treat SUD due to out of scope of practice reasons. The burden is then to accomplish a valid intervention via a behavioral health provider; however, the window to accomplish this is prohibitively narrow.

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