NORTHEND

MONTANA AGENCY PATH INSIGHT

How to Choose the Right Montana Agency Path

Montana separates private-pay nonmedical care, Medicaid personal-care participation, state-licensed Home Health Agencies, Home Infusion Therapy Agencies, and hospice. The right path depends on the exact services, payer, clinical scope, and care setting.

Private-Pay Nonmedical Home Care

Montana's current health-care-facility application list and statutory facility categories do not identify a general state facility license for a private-pay agency limited to nonmedical homemaker, companion, and personal-assistance services. Confirm the planned scope with the appropriate authority before opening, especially if staff will perform health-related tasks.

No general facility license does not mean no requirements. Business formation, local licensing and zoning, employment rules, background screening, insurance, privacy, client agreements, personnel records, incident systems, and written operating policies may still apply. Keep services within the agency's lawful non-skilled scope.

Medicaid CFCS and Personal Care Services

Montana Medicaid operates Community First Choice Services and Personal Care Services through agency-based and self-directed models. This is a payer and program-participation pathway—not a substitute for any license required by the services provided.

An agency pursuing these programs must evaluate Medicaid enrollment, service authorization, provider qualifications, supervision, documentation, electronic visit verification, billing, and program-specific requirements separately from private-pay operations.

Home Health Agency

A Montana Home Health Agency is state licensed. Its statutory service model includes skilled nursing by or under a registered nurse plus at least one other therapeutic service, such as physical, occupational, or speech therapy; medical social services; or home health aide services. Support services may be added within the approved scope.

The agency needs qualified clinical leadership and staff, approved policies, service-area and professional-staff information, assessments and plans of care, clinical records, supervision, infection control, quality systems, and survey-ready evidence. Medicare certification and Medicaid enrollment are separate processes.

Home Infusion Therapy Agency

Montana separately licenses Home Infusion Therapy Agencies providing parenteral medications or parenteral or enteral nutrition in a patient's residence. Pharmacy coordination, medication and treatment controls, qualified clinical staff, education, records, quality assurance, and agency-specific policies must match this specialized service.

Hospice Pathways

Montana licenses a home-based Hospice Program, an In-Patient Hospice, and a Residential Hospice. The pathway requires interdisciplinary end-of-life care, 24-hour availability, qualified staff, clinical and bereavement systems, quality oversight, records, and approved policies. In-patient and residential settings add building, floor-plan, and physical-environment requirements.

Questions to consider

- Will services stay nonmedical, or include nursing, therapy, medications, infusion, or other clinical care?
- Will the agency serve private-pay clients, participate in Medicaid CFCS/PCS, pursue Medicare, or combine payers?
- Does the planned home health model include skilled nursing plus another therapeutic service?
- Will hospice care be delivered in homes, an inpatient setting, or a residential hospice?

Unlicensed does not mean unregulated

A private-pay nonmedical model may fall outside Montana's listed health-care-facility license categories, but the business still needs a defensible service scope and complete operational systems. Do not use an unlicensed model to deliver skilled or otherwise regulated services.

Payer participation is separate

A state license does not automatically create Medicare certification, Montana Medicaid enrollment, accreditation, managed-care contracts, or authorization to bill a payer. Likewise, a payer program does not erase licensing duties. Map each planned revenue source before building the agency.

Application and provisional license

Montana's Licensure Bureau provides facility-specific applications and initial-licensure guidance. Current Home Health and Hospice letters call for the application and fee, policies and procedures submitted at least 45 days before the expected opening, and other provider-specific documents. After approval, the Bureau may issue a six-month provisional license.

Survey readiness comes before clients

A licensed health-care facility may not accept patients before the license is issued. During the provisional period, a Licensure Bureau surveyor conducts an on-site review. Licensed premises and records must remain available for inspection, so the office, personnel files, clinical records, policies, and evidence tools must be operational—not merely drafted.

Certificate of Need

Current Montana guidance states that Home Health Agencies and hospices do not require Certificate of Need review before licensure. Do not assume the same for a different facility project; Montana's CON program continues to cover specified long-term-care projects and certain expansions.

Build the agency in the right order

Define the services and payer first. Then confirm the license or program path, legal entity, office and service area, ownership and leadership, staffing, policies, forms, application documents, provisional-license sequence, survey evidence, certification, and enrollment requirements.

Planning a Montana agency?

NorthEnd Consulting helps owners define the correct service scope and prepare the licensing documents and operational structure that match the Montana agency plan.

Visit northendconsultants.com to discuss your agency plan

Current as of November 2026. Requirements, forms, fees, exemptions, service definitions, CON rules, and federal or payer enrollment requirements may change. Licensing, certification, accreditation, enrollment, and payer contracting are separate decisions controlled by the applicable authorities. This is a general planning resource. NorthEnd Consulting does not guarantee approval.