council for Mental Wellbeing

CENTER OF EXCELLENCE for Integrated Health Solutions

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CoE-IHS Webinar:

Billing for Bi-Directional Integrated Care Models

Monday, September 29, 2025 12:30-2 pm ET

Disclaimer

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Polls

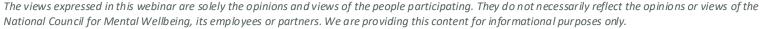
Which best describes your agency/organization?

- Mental health provider organization
- Substance use provider organization
- Primary care provider organization
- Government (federal, state, island area, local)
- Education or research institute
- Association, coalition, or network-foradvocacy, professionals, or individuals
- Business (health management, insurer, or other industry)
- Other

- 2) Are you a Promoting the Integration of Primary and Behavioral Health Care (PIPBHC) recipient or provider organization?
 - Yes, I am a current PIPBHC: Collaborative Care Model (CoCM) recipient
 - Yes, I am a current PIPBHC: Collaborative Care Model (CoCM) provider organization
 - Yes, I am a current PIPBHC: States recipient
 - Yes, I am a current PIPBHC: States provider organization
 - Yes, I am a former PIPBHC recipient or provider organization
 - No
 - I don't know







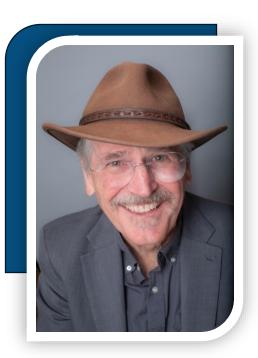
Speaker Introduction



Rachael Matulis, MPH
Principal, Bowling
Business Strategies



Selina HickmanPrincipal, Bowling
Business Strategies



Dr. Neal Bowen, PhD *Founder and Principal,*Alba Consulting



Dr. Virna Little, PsyD, LCSW-R, SAP, CCM *Co-Founder,* Concert
Health and Zero Overdose



Learning Objectives

- Understand new billing codes applicable to integrated care services available under the 2025 Medicare Physician Fee Schedule
- Describe billing codes and related strategies to support bi-directional integrated care
- Estimate potential billable revenue using the updated Decision Support Tool

Let's talk about Medicare!



Why focus on Medicare financing as a part of your sustainable integrated care strategy?



Aging U.S. population with increased behavioral health needs



Ability to bill for non-direct services and address social needs



Expanded billing opportunities for behavioral health staff



Increase revenue diversification & sustainability of programs



Where Medicare goes, other payers tend to follow

Nearly 20% of U.S. population covered by Medicare, which is over 65 million people!

Understanding & leveraging Medicare billing opportunities helps ensure that evidence-based integrated care approaches are sustainable and accessible to consumers across the lifespan.

Integrated Care: Medicare Coverage Timeline

2013-2019: Laying the Groundwork

2013: **Transitional Care Management (TCM)** codes
introduced

2014: **Chronic Care Management (CCM)** codes proposed

2015: **Chronic Care Management (CCM)** billing begins

2016-2017: Expansion to Behavioral Health Integration (BHI) through new billing codes for the Collaborative Care Model (CoCM) and BHI

2018-2019: Expansion of CCM and Virtual Care through remote patient monitoring codes and additional CCM codes

2020-2021: Telehealth and Care Coordination Growth

2020: **Telehealth and care coordination coverage expansion**, supporting virtual integration of behavioral health and primary care

2021: Centers for Medicare & Medicaid Services permanently allowed CoCM and BHI services to be billed via telehealth, making integrated behavioral health more accessible

2022-2023: Focus on Social and Environmental Factors that Affect Health and

Community Support

2022: New codes for Principal Care Management (PCM) introduced

2023: Payment expanded for community health integration, recognizing social and environmental factors that affect health in care management

2024: Continued Integration of Behavioral Health

New General BHI codes

New Community Health
Integration service to
address unmet healthrelated social needs

New Principal Illness
Navigation (PIN) and PIN –
Peer Support to navigate
clinical and support
resources

New **risk assessment** codes for social and environmental factors that affect health

New recognized providers,
Marriage and Family
Therapists and Mental
Health Counselors

2025: Additions for Safety Planning and Caregiver Support

New Safety Planning Interventions (SPI) for crisis management

New Medicare payment for caregiver training services

New interprofessional consultation codes

New **Digital Mental Health** treatment codes

Expanded support for **opioid treatment programs (OTPs)** to include care coordination and peer support

Who can bill Medicare?

Behavioral Health Billing Practitioners

Physicians

Includes psychiatrists and other medical doctors providing behavioral health services.

Clinical Psychologists

Licensed psychologists who provide psychotherapy and other mental health services.

Clinical Social Workers

Licensed social workers specializing in behavioral health care.

New as of January 2024

Marriage and Family Therapists

Licensed therapists specializing in family and relationship counseling.

Mental Health Counselors

Licensed counselors focusing on individual and group therapy.

*Includes addiction counselors.

Nurse Practitioners

Advanced practice registered nurses with training in behavioral health.

Clinical Nurse Specialists

Registered nurses with advanced expertise in mental health.

Physician Assistants

Certified professionals who provide behavioral health services under physician supervision.

Certified Nurse-Midwives

In some cases, midwives provide behavioral health services related to maternal mental health.

Certified Registered Nurse Anesthetists

In specific contexts may provide behavioral health-related care.

Sources: Centers for Medicare & Medicaid Services. (2023, November 16). Medicare and Medicaid programs; CY 2024 payment policies under the physician fee schedule (88 FR 78818). Federal Register.

Centers for Medicare & Medicaid Services. (2023, December 21). Medicare General Information, Eligibility, and Entitlement: Chapter 5 — Definitions (Transmittal 12425). Baltimore, MD: Centers for Medicare & Medicaid Services. Retrieved from https://www.cms.gov/Regulations-and-Guidance/Guidance/Guidance/Manuals/Downloads/ge101c05.pdf

Who can provide Medicare billable services under the supervision of a billing practitioner?

Auxiliary Staff Examples (not exhaustive)

Community Health Worker

A frontline health worker who often lives in or comes from the communities they serve.

Mental Health Navigator

Assists patients and families to find appropriate mental health caregivers, facilities and services.

Certified Peer

An individual with lived experience who is trained and certified to provide support to individuals and their families receiving behavioral health supports and services.

Registered Nurse

Licensed professional that can provide a wide range of patient care services.

Social Worker

An unlicensed social worker may participate in support sessions, client assessments and helping people obtain necessary services.

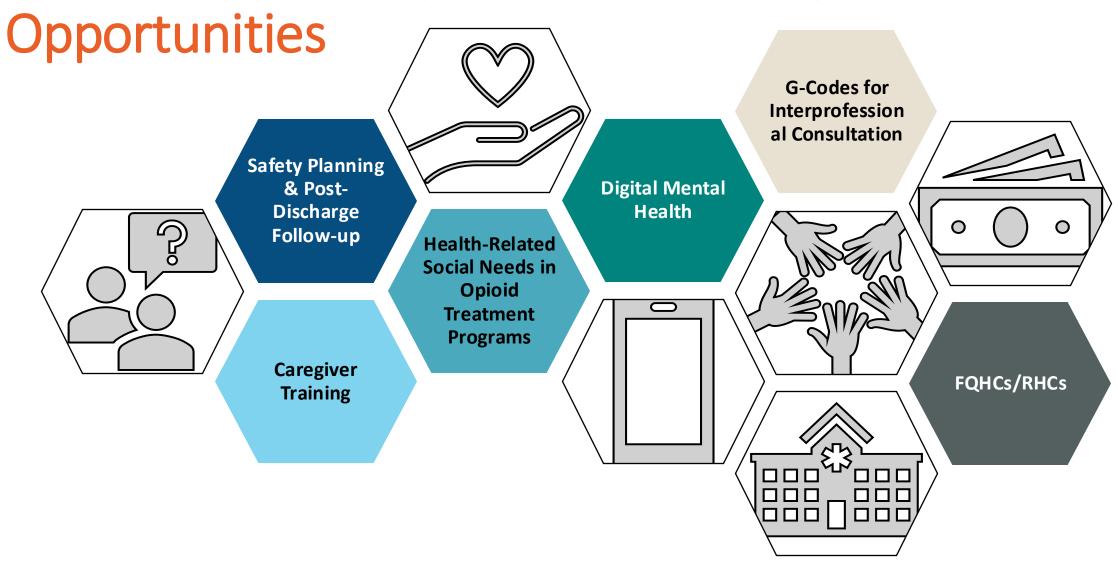
Unlicensed Behavioral Health Tech

Assists with providing direct patient care in support of a care team.

Sources: Centers for Medicare & Medicaid Services. (2023, November 16). Medicare and Medicaid programs; CY 2024 payment policies under the physician fee schedule (88 FR 78818). Federal Register.

Centers for Medicare & Medicaid Services. (2023, December 21). Medicare General Information, Eligibility, and Entitlement: Chapter 5 — Definitions (Transmittal 12425). Baltimore, MD: Centers for Medicare & Medicaid Services. Retrieved from https://www.cms.gov/Regulations-and-Guidance/Guidance/Guidance/Manuals/Downloads/ge101c05.pdf

CY:2025 New Integrated Care Billing



Summary of 2025 Medicare Billing Codes Related to Integrated Care

Service	Brief Description	Medicare Billing Codes
Caregiver training	Caregiver training in behavior management/modification for caregivers of patients with a mental or physical health diagnosis	G0539, G0540
Safety planning	Safety planning interventions for patients in crisis, such as those at risk for suicide or overdose	G0560
Post-discharge follow-up	Follow-up after a crisis encounter (bundled service including four phone calls in a month)	G0544
Interprofessional consultation, G-codes	Enable mental health practitioners to give or seek another provider's expert advice about a patient's care	G0546-G0549, G0550, G0551
Digital mental health	Provide digital mental health treatment device, education, and ongoing monthly treatment	G0552, G0553, G0554

Source: Centers for Medicare & Medicaid Services. (2024, December 9). Medicare and Medicaid programs; CY 2025 payment policies under the physician fee schedule (89 FR 97710). Federal Register.



FQHC Unbundling of G0511 in CY2025

Collection of physiologic data (99091, 99474)

Principal care management services (99424-99427)

Chronic care management (99437, 99439)

Remote monitoring (99453, 99454, 99457, 99458) Care management for behavioral health (99484, G0323)

Complex care management (99487-99491)

Remote therapeutic monitoring (98975-98977, 98980, 98981) Principal illness navigation (G0140, G0146, G0023, G0024)

Chronic pain management (G3002, G3003)

Community health integration (G0019, G0022)

For CY2026: Possible FQHC unbundling of G0512 to bill for individual Current Procedural Terminology (CPT) codes such as 99492, 99493, and 99484.

Source: Centers for Medicare & Medicaid Services. (2024, December 9). Medicare and Medicaid programs; CY 2025 payment policies under the physician fee schedule (89 FR 97710). Federal Register.





Looking Ahead: CY 2026 Proposed Rule

Creating

Creating optional add-on codes for Advanced Primary Care Management (APCM) services to facilitate complementary behavioral health integration (BHI) or psychiatric Collaborative Care Model (CoCM) services

Expanding

Expanding digital mental health treatment to include payment for devices used in the treatment of Attention Deficit Hyperactivity Disorder (ADHD)

Allowing

Allowing psychiatric diagnostic evaluation (90791) and Health Behavior Assessment and Intervention codes (e.g., 96156, 96158) to serve as initiating visits for Community Health Integration

Removing

Removing G0136 (administration of standardized risk assessment for social and environmental factors that affect health)

Reframing

Reframing social and environmental factors that affect health as "upstream drivers"

Source: Centers for Medicaid Services. (2025, July 16). Medicare and Medicaid programs; CY 2026 payment policies under the physician fee schedule (90 FR 32352). Federal Register.





On-the-ground perspectives on integrated care billing: Dr. Virna Little





Bi-directional Care Coordination & Integration Module



New Billing Resource

Coming soon at:

https://www.thenationalcouncil .org/resources/financing-thefuture-of-integrated-care/

2025 Bi-Directional Care Coordination & Integration Billing Code Options

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What is meant by bi-directional care integration?

1

Billing codes that support **primary care and other medical office providers**(e.g., OB-GYNs) to better coordinate and integrate behavioral health services, including mental health and substance use treatment services.

2

Billing codes that support mental health and substance use treatment providers to better coordinate and integrate physical health care.

Source: Substance Abuse and Mental Health Services Administration. (2023). *Promoting integration of primary and behavioral health care (PIPBHC) – FY 2024 notice of funding opportunity (SM-24-003)*. SAMHSA. https://www.samhsa.gov/sites/default/files/grants/pdf/fy-2024-pipbhc-states-sm-24-003.pdf





PIPBHC Requirements for Integrated Care Domains

Access, screening, referral to care, and follow-up

Evidence-supported prevention and intervention

Multidisciplinary team

Person-centered self-management support

Linkages with community and social services

Ongoing care coordination and care management

Source: Substance Abuse and Mental Health Services Administration. (2023). *Promoting integration of primary and behavioral health care (PIPBHC) – FY 2024 notice of funding opportunity (SM-24-003)*. SAMHSA. https://www.samhsa.gov/sites/default/files/grants/pdf/fy-2024-pipbhc-states-sm-24-003.pdf





Evidence-Supported Intervention: Physical Health Settings

Psychiatric collaborative care model (99492-99494, G2214, G0512) General behavioral health care management (99484, G0323)

Office-based opioid treatment bundle (G2086-G0288)

Urine drug testing (80305)

Tobacco cessation counseling (99406, 99407)

Health behavior & intervention (96156, 96158, 96159, 96164)

Psychotherapy (90791, 90792, 90832, 90834, 9037)

Digital mental health (G0552-G0554)

Sources: American Medical Association. (2024). CPT® 2025: Current Procedural Terminology (Professional ed.). American Medical Association.

Centers for Medicare & Medicaid Services. (2024, December 9). Medicare and Medicaid programs; CY 2025 payment policies under the physician fee schedule (89 FR 97710). Federal Register.



Evidence-Supported Intervention: Behavioral Health Settings

Evaluation & Management (e.g., 99202-99205, 99212-99215)

Metabolic Monitoring (e.g., 83036, 82962, 80061)

Wound care (97597, 97598)

Tobacco cessation counseling (99406, 99407)

Remote patient monitoring (99453-99458) Review and collection of physiological data (99091)

Sources: American Medical Association. (2024). CPT® 2025: Current Procedural Terminology (Professional ed.). American Medical Association.

Centers for Medicare & Medicaid Services. (2024, December 9). Medicare and Medicaid programs; CY 2025 payment policies under the physician fee schedule (89 FR 97710). Federal Register.





General Billing Strategies Associated with Implementing Integrated Care Models

- **Ensure** maximization of "new" Medicare billing opportunities for integrated care
- Leverage auxiliary staff
- Increase points of access to care
- **Consider** use of relevant billing codes to support historically "unbillable" services
- 4 Advocate for availability of a comprehensive array of care coordination and care integration billing codes
- ✓ Assess feasibility of implementation
- Monitor progress using a standardized integration framework





Increase points of access to care - Example

Allow payments for mobile clinics, telehealth, e-visits, and home-based Allow services Support reimbursement for digital mental health treatment and Support remote patient monitoring Promote use of the "street medicine" place of service code (27) **Promote**



Assess feasibility of implementation - Example

Billing Code Group	Staff Required	Target Population	Patient Complexity	Implementation Burden	Documentation Burden	Reimbursement Potential ¹
Principal Care Management (99424– 99427)	Clinical staff + physician oversight	Clients with one serious chronic condition	Moderate to high	Moderate: Requires monthly tracking and care plan updates	Moderate: Requires time logs, care plan, and patient consent	\$ Moderate: ~\$60–\$90/month depending on time and complexity
Chronic Care Management (99490, 99439, 99491)	Clinical staff or physician	Clients with ≥2 chronic conditions	Moderate	Low: Widely adopted;fits into existing workflows	Moderate: Requires structured care plan and time documentation	\$ Moderate: ~\$62-\$95/month depending on time
Complex Chronic Care Management (99487, 99489)	Clinical staff + physician	Clients with multiple conditions needing complex coordination	High	→ Moderate: Requires higher-level coordination and planning	High: Requires detailed care plan, moderate/high complexity, and time tracking	\$ High: ~\$93-\$140/month depending on time
Interprofessional Consultation (99446– 99452)	Consulting + treating providers	Clients needing specialist input	Varies	Low: Can be done asynchronously; no direct patient contact	Moderate: Requires documentation of consult, time, and outcome	\$ Low: ~\$18-\$40 per consult depending on time
Collaborative Care Model (CoCM: 99492–99494)	Physician, BH care manager, psychiatric consultant	Clients with behavioral health needs managed via team-based care	Mild to moderate	High: Requires registry, team coordination, and reporting	 High: Requires registry tracking, structured reporting, and team documentation 	\$ High: ~\$145-\$250/month depending on intensity
Behavioral Health Integration (99484)	Physician + BH support	Clients with mild to moderate behavioral health needs	Mild to moderate	Low: Easier to implement than CoCM; single provider model	O Low to Moderate: Requires care plan and tracking, but less intensive than CoCM	\$ Moderate: ~\$53/month

¹Approximate per person, per month, based on the 2025 Medicare Physician Fee Schedule.





Perspectives from a former PIPBHC grantee: Dr. Neal Bowen



Challenges to Sustainability & Fidelity

Sustainability

- Difficulty identifying payment for integrated care
- Billing staff not specifically trained in the model
- Limitations by payment sources
- Reliance on grants
- Administrators unsure of feasibility of continuing in absence of grant

Fidelity

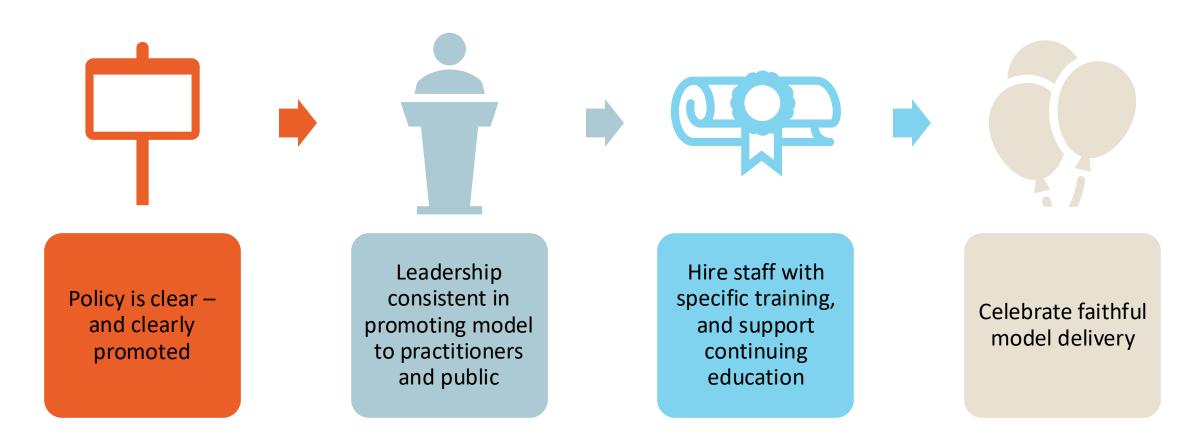
- Clinical staff both PC and BH not trained in the model
- Not billing for services that are eligible
 - Billing guidelines murky
 - Policy murky
 - Single model payable
- Care coordinators not valued
 - Or not stepping into their role with practitioners
- Model not presented to patients in clear manner

Source: Content based on the professional experience and insight of Dr. Bowen.





Pathways to Fidelity



Source: Content based on the professional experience and insight of Dr. Bowen.



Pathways to Sustainability



Develop policy to reimburse PIPBHC models that are both internal to a single organization, and those based on collaboration



Use Value Based Payment structure to reward fidelity over approximation

Source: Content based on the professional experience and insight of Dr. Bowen.







Decision Support Tool (DST)

Learn to calculate potential revenue, and more...



What's new in the DST for 2025?

Updated services and rates for 2025

Code year of implementation

Telehealth flag (provisional vs. permanent)

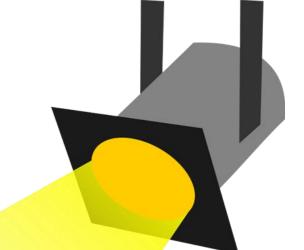
Physician work relative value units (wRVUs)

Revenue model for primary care in BH settings





Spotlight on DST Worksheets



Background

Instructions

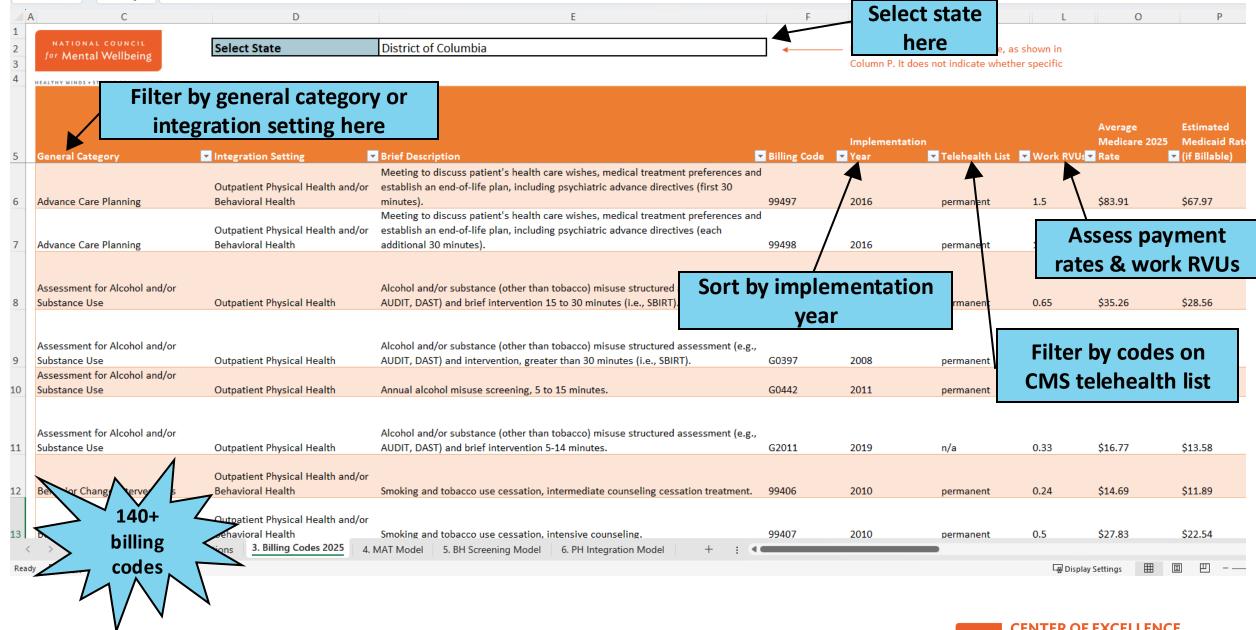
Billing codes

Medication for addiction treatment model

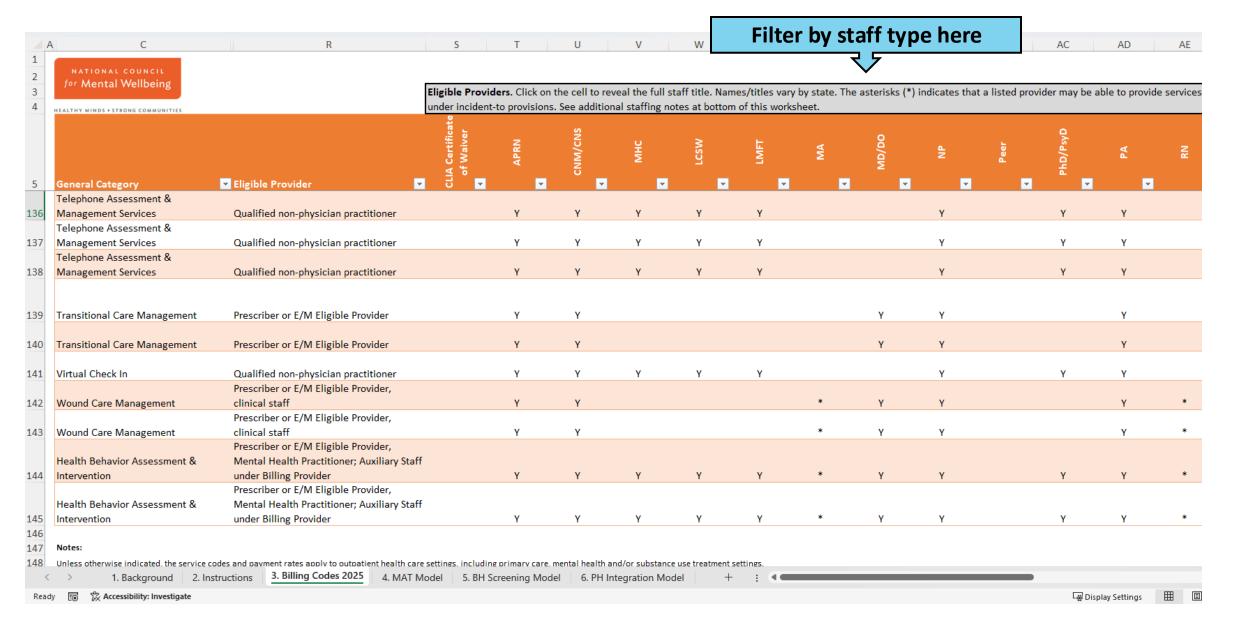
Behavioral health screening model Primary care monitoring in behavioral health model

New for 2025!

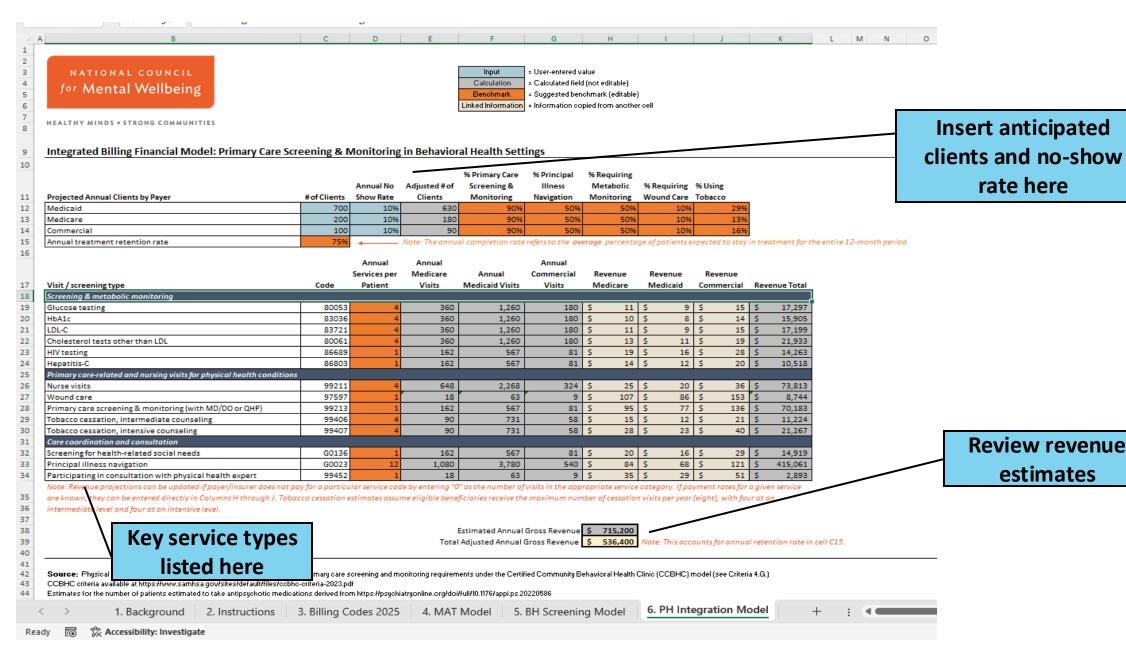










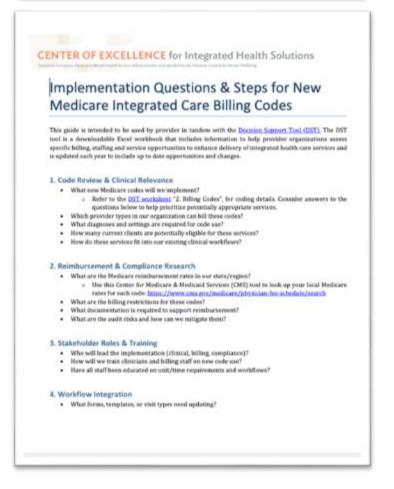




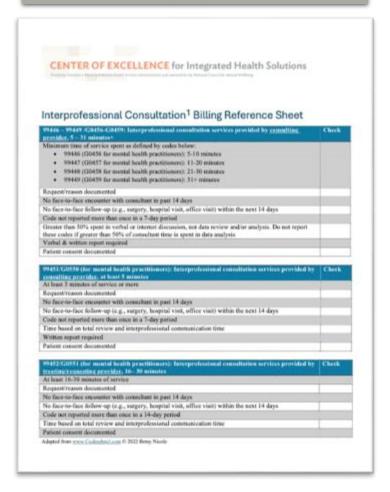


New Code Action Plan

Handouts



Interprofessional Consultation Reference Sheet





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Putting it all together

Medicare is enrolling more behavioral health provider types

Medicare is paying for additional types of integrated care services



Use the *new* bi-directional care billing code module to identify potentially billable services at your organization



Use the updated Decision Support
Tool to quickly identify potential
Medicare payment rates and
potential Medicaid coverage in
your state. Confirm actual rates
with local payers



Follow the Implementation
Questions and Steps Hand-out to
work through additional
implementation tasks and
considerations

References

- American Medical Association. (2024). CPT® 2025: Current Procedural Terminology (Professional ed.). American Medical Association.
- Centers for Medicare & Medicaid Services. (2025, July 16). Medicare and Medicaid programs: Calendar year 2026 payment policies under the physician fee schedule and other changes to Part B payment and coverage policies; Medicare shared savings program requirements; and Medicare prescription drug inflation rebate program (90 FR 32352). Federal Register. Retrieved August 27, 2025, from https://www.govinfo.gov/content/pkg/FR-2025-07-16/pdf/2025-13271.pdf
- Centers for Medicare & Medicaid Services. (2024, December 9). Medicare and Medicaid programs; CY 2025 payment policies under the physician fee schedule and other changes to Part B payment and coverage policies; Medicare Shared Savings Program requirements; and Medicare prescription drug inflation rebate program (89 FR 97710). Federal Register. Retrieved August 27, 2025, from https://www.govinfo.gov/content/pkg/FR-2024-12-09/pdf/2024-25382.pdf
- Centers for Medicare & Medicaid Services. (n.d.). Medicare monthly enrollment. In Summary statistics on beneficiary enrollment: Medicare and Medicaid reports. CMS. Retrieved August 27, 2025, from https://data.cms.gov/summary-statistics-on-beneficiary-enrollment/medicare-and-medicaid-reports/medicare-monthly-enrollment





References

- Centers for Medicare & Medicaid Services. (2023, November 16). Medicare and Medicaid programs; CY 2024 payment policies under the physician fee schedule and other changes to Part B payment and coverage policies (CMS-1784-F) (88 FR 78818). Federal Register. Retrieved from https://www.federalregister.gov/documents/2023/11/16/2023-24184/medicare-and-medicaid-programs-cy-2024-payment-policies-under-the-physician-fee-schedule-and-other
- Centers for Medicare & Medicaid Services. (2023, December 21). Medicare General Information, Eligibility, and Entitlement: Chapter 5 Definitions (Transmittal 12425). Baltimore, MD: Centers for Medicare & Medicaid Services. Retrieved August 27, 2025, from https://www.cms.gov/Regulations-and-Guidance/Manuals/Downloads/ge101c05.pdf
- Substance Abuse and Mental Health Services Administration. (2023). Promoting integration of primary and behavioral health care (PIPBHC) – FY 2024 notice of funding opportunity (SM-24-003). SAMHSA. https://www.samhsa.gov/sites/default/files/grants/pdf/fy-2024-pipbhc-states-sm-24-003.pdf



Questions and Discussion

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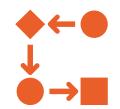




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