

November 5, 2025

Major Step Forward for Implementation of Integration of Behavioral Health and Primary Care: Medicare Physician Fee Schedule CY 2026 Final Rule

On October 31, 2025, the Centers for Medicare and Medicaid (CMS) approved the Advanced Primary Care Management (APCM) optional behavioral health integration add-on codes for billing and reimbursement under the 2026 Medicare Physician Fee Schedule. The new behavioral health add-on services codes are: GPCM1 for initial psychiatric collaborative care management, GPCM2 for subsequent psychiatric collaborative care, and GPCM3 for care management services for behavioral health. They must be billed in conjunction with the APCM service base code for high-quality advanced primary care services.

CMS had proposed this payment reform in its July 2025 Notice of Proposed Rule Making, to which several MHLG patient advocacy organizations, including NHMH, submitted comments in support. NHMH is pleased to see our recommendation as to this proposal accepted into the Final Rule for the 2026 MPFS.

The new BHI add-on codes represent an important primary care and behavioral health payment reform. It will go some way to allowing practices the financial where-with-all to provide BH services, providing practices with a prospective, PMPM, upfront reliable payment. Potentially, practices integrating behavioral services will be able to bill and be reimbursed for the APCM base code + BH add-ons + E&M payment. The reform also gives sites flexibility in how to deliver integrated care to meet their patient needs and practice resources. With this expansion of integrated care implementation the field and patients could see new behavioral integration strategies and approaches emerge organically that further improve patient outcomes and experience of care. The Medicare 2026 Physician Fee Schedule Final Rule is one step forward, but an important one.

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