What's Changed?

No substantive content updates
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The medical community now widely considers integrating behavioral health care with primary care (behavioral health integration or BHI) an effective strategy for improving outcomes for millions of Americans with mental or behavioral health conditions.

**What is BHI?**

BHI is a type of care management service. In recent years, we expanded the suite of codes describing care management services. New codes describe services that involve:

- Direct patient contact, in-person or face-to-face services that don’t involve direct patient contact
- Representing a single encounter, a monthly service, or both
- Timed services
- Addressing specific conditions
- Representing the work of the billing practitioner, auxiliary personnel (specifically, clinical staff), or both

**BHI Services Using the Psychiatric Collaborative Care Model**

On January 1, 2017, we began making separate payments to physicians and non-physician practitioners supplying BHI services using the Psychiatric Collaborative Care Model (CoCM) approach to patients during a calendar month. In 2018, we established payment for general BHI services using models of care other than CoCM and began making payment for these services using CPT codes:

- 99492
- 99493
- 99494

**HCPCS Code G2214: Refining Coding for CoCM Services**

We added the BHI service in the [CY 2021 MPFS Final Rule (CMS-1734-F)](https://www.hhs.gov/centers/mepf) and on January 1, 2021, we began making payment for the services with the following criteria:

- Initial or subsequent psychiatric collaborative care management
- First 30 minutes in a month of behavioral health care manager activities
- In consultation with a psychiatric consultant, and directed by the treating physician or other qualified health care professional

An example of when to use this code is when you see a patient for services, then hospitalize them or refer them for specialized care, and you don’t meet the number of minutes needed to bill for services using the current coding.
New HCPCS Code G0323: Care Management Services for Behavioral Health Conditions

- New for CY 2023: Describes general BHI that a clinical psychologist (CP) or clinical social worker (CSW) performs to account for monthly care integration
- A CP or CSW, serving as the focal point of care integration furnishes the mental health services
- At least 20 minutes of CP or CSW time per calendar month

Tip: Psychiatric diagnostic evaluation (CPT code 90791) serves as the initiating visit for G0323

Psychiatric CoCM

Use CPT codes 99492, 99493, and 99494, and HCPCS codes G2214 to bill for monthly services delivered using the CoCM, an approach to BHI shown to improve outcomes in multiple studies.

What is CoCM? This figure is a model of behavioral health integration that enhances usual primary care by adding 2 key services to the primary care team, particularly patients whose conditions aren’t improving:

- Care management support for patients receiving behavioral health treatment
- Regular psychiatric inter-specialty consultation
- A team of 3 individuals deliver CoCM:
  - Behavioral Health Care Manager
  - Psychiatric Consultant
  - Treating (Billing) Practitioner

Figure 1: Illustration of a CoCM model
CoCM Care Team Members

- **Treating (Billing) Practitioner** – A physician or non-physician practitioner (physician assistant or nurse practitioner); typically primary care, but may be of another specialty (for example, cardiology, oncology)

- **Behavioral Health Care Manager** – A designated provider with formal education or specialized training in behavioral health (including social work, nursing, or psychology), working under the oversight and direction of the billing practitioner

- **Psychiatric Consultant** – A medical provider trained in psychiatry and qualified to prescribe the full range of medications

- **Patient** – The patient is a member of the care team

CoCM Service Components

- The primary care team performs the initial assessment and are responsible for the administering the validated rating scales.

- The primary care team’s joint care planning with the patient, with care plan revision for patients whose condition isn’t improving adequately. Treatment may include pharmacotherapy, psychotherapy, or other recommended treatments.

- Behavioral health care manager following up proactively and systematically using validated rating scales and a registry:
  - Assesses treatment adherence, tolerability, and clinical response using validated rating scales
  - Delivers brief, evidence-based psychosocial interventions such as behavioral activation or motivational interviewing
  - 70 minutes of behavioral health care manager time the first month
  - 60 minutes following months
  - Add-on code for 30 more minutes any month

- Regular case load review by the behavioral health care manager and the psychiatric consultant:
  - The behavioral health care manager and the psychiatric consultant review weekly the patient’s treatment plan and status, and if the patient is not improving, discuss the patient’s treatment plan for potential revision with the psychiatric consultant
  - The primary care team continues or adjusts treatment, including referral to behavioral health specialty care, as needed
**General BHI**

Practitioners use CPT code 99484 to bill monthly services delivered using BHI models of care other than CoCM that also include service elements such as:

- Systematic assessment and monitoring
- Care plan revision for patients whose condition isn’t improving adequately
- Continuous relationship with an appointed care team member

You may also use CPT code 99484 to report models of care that do not involve a psychiatric consultant, or an appointed behavioral health care manager, although these personnel may deliver General BHI services. We expect to refine this code over time, as more information becomes available about other BHI care models in use.

**General BHI Service Parts**

- Initial assessment, including administering applicable validated clinical rating scales
- Systematic assessment and monitoring, using applicable validated clinical rating scales
- The primary care team’s joint care planning with the patient, with care plan revision for patients whose condition isn’t improving
- Facilitation and coordination of behavioral health treatment
- Continuous relationship with an appointed member of the care team

**General BHI Care Team Members**

- **Treating (Billing) Practitioner** – A physician or non-physician practitioner (PA, NP, CNS, CNM); typically primary care, but may be of another specialty (for example, cardiology, oncology, psychiatry).
- **Patient** – The patient is a member of the care team.
- **Potential Clinical Staff** – The billing practitioner delivers the service in full or uses qualified clinical staff to deliver services using a team-based approach. Clinical staff includes contractors who meet the qualifications for the CoCM behavioral health care manager or psychiatric consultant.

**Tip:** We allow psychiatric consultants and other members of the care team to offer certain services remotely under the BHI codes.

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**Eligible Conditions**

We classify eligible conditions as any mental, behavioral health, or psychiatric condition that the billing practitioner treats, including substance use disorders that in the clinical judgment of the billing practitioner, calls for BHI services. The patient may have pre-existing conditions, or the billing practitioner may make the diagnosis(es) and refine them over time.

Tip: Patients may, but don’t need to have, comorbid, chronic, or other medical conditions that the billing practitioner manages.

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**Relationships & Roles of Care Team Members**

Practitioners use BHI codes to bill and get paid for services using models of care with well-defined roles and relationships among the care team members. The following roles and relationships describe all BHI services unless noted:

**Incident To**

We consider BHI services delivered by other members of the care team, under the direction of the billing practitioner, incident to the billing practitioner’s services. These services are subject to the state law, licensure, and scope of practice that applies to their practice specialty. The billing practitioner either employs or contracts with the other care team members. Medicare pays the billing practitioner directly.

**Initiating Visit**

We require an initiating visit for new patients or patients not seen within 1 year before the start of BHI services. This visit establishes the patient's relationship with the billing practitioner and makes sure the billing practitioner assesses the patient before starting BHI services.

**Treating (Billing) Practitioner**

- Directs the behavioral health care manager or clinical staff
- Oversees the patient’s care, including prescribing medications, providing treatments for medical conditions, and making referrals to specialty care when needed
- Stays involved through ongoing oversight, management, collaboration, and reassessment
- May deliver the General BHI service in its entirety
Behavioral Health Care Manager (needed for CoCM; optional for General BHI)

- Gives assessment and care management services, including:
  - Administering validated rating scales
  - Behavioral health care planning about behavioral or psychiatric health problems
  - Revisions for patients not progressing or whose status changes
  - Brief psychosocial interventions
  - Ongoing collaboration with the billing practitioner
  - Maintenance of the registry
  - Consultation with the psychiatric consultant
- Has a continuous relationship with the patient and:
  - Is available to deliver services face-to-face with the patient
  - Has collaborative, integrated relationship with the rest of the care team
- Can work with the patient outside of regular clinic hours as necessary to perform the behavioral health care manager’s duties
- May or may not be a practitioner who meets all the requirements to independently deliver and report services to Medicare
- Doesn’t include administrative or clerical staff; you don’t count time spent in strictly administrative or clerical duties towards the time threshold to bill the BHI codes

Psychiatric Consultant (needed for CoCM; optional for General BHI)

- Takes part in regular review of clinical status of patients getting BHI services
- Tells the billing practitioner and behavioral health care manager about diagnosis
- Indicates ways for resolving issues with patient adherence and tolerance of behavioral health treatment
- Adjusts behavioral health treatment for patients who aren’t progressing
- Manages any negative interactions between patients’ behavioral health and medical treatments
- Can (and typically will) be remotely located
- Is generally not expected to have direct contact with the patient, prescribe medications or deliver other treatment directly to the patient
- Can and should offer a referral for direct provision of psychiatric care when clinically indicated
Clinical Staff (may provide General BHI)

- Continuous relationship with the patient and a collaborative, integrated relationship with the rest of the care team
- May or may not be a provider who meets all the requirements to independently deliver and report services to Medicare
- Doesn’t include administrative or clerical staff time
- May include (but not required to include) a behavioral health care manager or psychiatric consultant

Supervision

We assign BHI services not personally performed by the billing practitioner as general supervision under the Medicare Physician Fee Schedule (MPFS). General supervision doesn’t, by itself, create a qualifying relationship between the billing practitioner and other members of the care team. We define general supervision as the service delivered under the overall direction and control of the billing practitioner, and that doesn’t require their physical presence during provision of services.

Advance Consent

Before starting BHI services, the patient must give the billing practitioner permission to consult with relevant specialists, which includes talking with a psychiatric consultant. The billing practitioner must inform the patient that cost sharing applies for both face-to-face and non-face-to-face services even if supplemental insurers cover cost sharing.

We don’t require written consent.

- You may get verbal consent from the patient
- You must document it in the medical record

Tip: Medicare Physician Fee Schedule (MPFS) payment is available under the MPFS whether the patient spends part or all of the month in a facility stay or institutional setting. Report the place of service (POS) where the billing practitioner would ordinarily deliver face-to-face care to the patient. Medicare can make separate Part B payment to hospitals, including critical access hospitals, when the billing practitioner reports a hospital outpatient POS.
### Table 1: BHI Coding Summary

<table>
<thead>
<tr>
<th>BHI Codes</th>
<th>Behavioral Health Care Manager or Clinical Staff Threshold Time</th>
<th>Assumed Billing Practitioner Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>BHI Initiating Visit (AWV, IPPE, TCM or other qualifying E/M) †</td>
<td>N/A</td>
<td>Usual work for the visit code</td>
</tr>
<tr>
<td>Care management services for behavioral health conditions (HCPCS code G0323)</td>
<td>At least 20 minutes of clinical psychologist or clinical social worker time, per calendar month</td>
<td>15 Minutes</td>
</tr>
<tr>
<td>CoCM First Month (CPT code 99492)</td>
<td>70 minutes per calendar month</td>
<td>30 minutes</td>
</tr>
<tr>
<td>CoCM Subsequent Months** (CPT code 99493)</td>
<td>60 minutes per calendar month</td>
<td>26 minutes</td>
</tr>
<tr>
<td>Add-On CoCM (Any month) (CPT code 99494)</td>
<td>Each additional 30 minutes per calendar month</td>
<td>13 minutes</td>
</tr>
<tr>
<td>General BHI (CPT code 99484)</td>
<td>At least 20 minutes per calendar month</td>
<td>15 minutes</td>
</tr>
<tr>
<td>Initial or subsequent psychiatric collaborative care management (HCPCS code G2214)</td>
<td>30 minutes of behavioral health care manager time per calendar month</td>
<td>Usual work for the visit code</td>
</tr>
</tbody>
</table>

**CoCM is delivered monthly for an episode of care that ends when targeted treatment goals are met or there is failure to meet targeted treatment goals culminating in referral for direct psychiatric care, or there is a break in episode (no CoCM for 6 consecutive months). †Annual Wellness Visit (AWV), Initial Preventive Physical Examination (IPPE), Transitional Care Management services (TCM).

### Full Code Descriptors

**CPT Code 99484: Care Management Services for Behavioral Health Conditions**

Care management services for behavioral health conditions, at least 20 minutes of clinical staff time, directed by a physician or other qualified health care professional time, per calendar month, with the following required elements:

- Initial assessment or follow-up monitoring, including using applicable validated rating scales
- Behavioral health care planning about behavioral or psychiatric health problems, including revision for patients not progressing or whose status changes
- Facilitating and coordinating treatment such as psychotherapy, pharmacotherapy, counseling, or psychiatric consultation
- Continuity of care with an appointed member of the care team

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CPT Code 99492: Initial Psychiatric CoCM
Initial psychiatric collaborative care management, first 70 minutes in the first calendar month of behavioral health care manager activities, in consultation with a psychiatric consultant, and that the treating physician or other qualified health care professional directs, with the following required elements:

- Outreach to and engagement in treatment of a patient directed by the treating physician or other qualified health care professional
- Initial assessment of the patient, including administering validated rating scales, with the development of an individualized treatment plan
- Review by the psychiatric consultant with modifications of the plan, if recommended
- Entering patient in a registry and tracking patient follow-up and progress using the registry, with proper documentation, and participation in weekly caseload consultation with the psychiatric consultant
- Provision of brief interventions using evidence-based techniques such as behavioral activation, motivational interviewing, and other focused treatment strategies

CPT Code 99493: Follow Up Psychiatric CoCM
Follow up psychiatric collaborative care management, first 60 minutes in a following month of behavioral health care manager activities, in consultation with a psychiatric consultant, and directed by the treating physician or other qualified health care professional, with the following required elements:

- Tracking patient follow-up and progress using the registry, with proper documentation
- Participation in weekly caseload consultation with the psychiatric consultant
- Ongoing collaboration with and coordination of the patient’s mental health care with the treating physician or other qualified health care professional and any other treating mental health providers
- Other review of progress and recommendations for changes in treatment, as indicated, including medications, based on recommendations supplied by the psychiatric consultant
- Provision of brief interventions using evidence-based techniques such as behavioral activation, motivational interviewing, and other focused treatment strategies
- Monitoring of patient outcomes using validated rating scales; and relapse prevention planning with patients as they achieve remission of symptoms, other treatment goals and prepare for discharge from active treatment

CPT Code 99494: Initial & Subsequent Psychiatric CoCM
Initial or subsequent psychiatric collaborative care management, each additional 30 minutes in a calendar month of behavioral health care manager activities, in consultation with a psychiatric consultant, and that the treating physician or other qualified health care professional directs (list separately from the code for the primary procedure)
HCPCS Code G0323: Care Management Services for Behavioral Health Conditions

Care management services for behavioral health conditions, at least 20 minutes of clinical psychologist or clinical social worker time, per calendar month:

- Initial assessment or follow-up monitoring, including using applicable validated rating scales; behavioral health care planning about behavioral or psychiatric health problems, including revision for patients who aren’t progressing or whose status changes
- Facilitating and coordinating treatment such as psychotherapy, coordination with and referral to physicians and practitioners who Medicare authorizes to prescribe medications and furnish E/M services, counseling or psychiatric consultation and continuity of care with an appointed member of the care team

HCPCS Code G2214: Initial & Subsequent Psychiatric CoCM

Initial or subsequent psychiatric collaborative care management, first 30 minutes in a month of behavioral health care manager activities, in consultation with a psychiatric consultant, and directed by the treating physician or other qualified health care professional:

- Tracking patient follow-up and progress using the registry, with proper documentation; participation in weekly caseload consultation with the psychiatric consultant
- Ongoing collaboration with and coordination of the patient’s mental health care with the treating physician or other qualified health care professional and any other treating mental health providers
- Other review of progress and recommendations for changes in treatment, as indicated, including medications, based on recommendations supplied by the psychiatric consultant
- Provision of brief interventions using evidence-based techniques such as behavioral activation, motivational interviewing, and other focused treatment strategies
- Monitoring of patient outcomes using validated rating scales
- Relapse prevention planning with patients as they achieve remission of symptoms, or other treatment goals and prepare for discharge from active treatment

Need More Information?

Find your MAC’s website.
Resources

- Agency for Healthcare Research and Quality-Develop a Shared Care Plan
- BHI FAQs
- CoCM Implementation Resources
- CY 2023 Medicare Physician Fee Schedule (MPFS) Final Rule

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