

IHCP *bulletin*

INDIANA HEALTH COVERAGE PROGRAMS BT2026151 SEPTEMBER 10, 2026

IHCP clarifies billing guidance for providers enrolled as a CCBHC or CMHC

The Indiana Health Coverage Programs (IHCP) and Division of Mental Health and Addiction (DMHA) are providing billing guidance for community mental health center (CMHC) and certified community behavioral health clinic (CCBHC) providers that are enrolled under multiple service locations. The goal of this guidance is to ensure that the state can identify the location at which each service is provided. This guidance also supports clear delineations in the data used for service mix calculations, financial forecasting and fiscal modeling.



National Provider Identifier usage

CCBHC and CMHC providers must use the correct National Provider Identifier (NPI) when submitting claims. CCBHCs are only allowed to have one NPI enrolled, and each CCBHC service location must be added under that NPI. The CMHC or CCBHC group NPI must be entered as the billing provider for the claim.

For providers with **all** service locations enrolled as a CCBHC:

- All services that fall within the CCBHC scope of services (detailed in the CCBHC encounter code list, accessible from the [Indiana Office of Medicaid Policy and Planning Provider Resources](https://myersandstauffer.com) webpage at myersandstauffer.com) and that are delivered within the designated CCBHC geographic county coverage area should be billed using the provider's applicable registered CCBHC NPI in field 33a on the CMS-1500 claim form (or equivalent field on electronic professional claim).
- Only the following services can be billed using the provider's CMHC NPI:
 - ⇒ Services that fall outside the scope of CCBHC services – such as residential services and services provided through a Home- and Community-Based Services (HCBS) program such as Adult Mental Health Habilitation (AMHH), Behavioral and Primary Healthcare Coordination (BPHC) and Child Mental Health Wraparound (CMHW)
 - ⇒ Services rendered outside the designated CCBHC geographic county coverage area – such as services provided at community-based locations in another area

For providers with only **some** locations enrolled as a CCBHC:

- Services rendered within the designated CCBHC geographic county coverage area for any of the provider's CCBHC locations should be billed following similar guidance as above:
 - ⇒ All services that fall within the scope of CCBHC services should be billed using the provider's applicable CCBHC NPI
 - ⇒ Only services that fall outside the scope of CCBHC services should be billed using the provider's applicable CMHC NPI

- Services rendered outside any of the provider's designated CCBHC geographic county coverage areas should be billed using the provider's applicable CMHC NPI. This includes the following:
 - ⇒ Services provided at a CMHC service location that is not also enrolled as a CCBHC and that falls outside any of the provider's designated CCBHC geographic county coverage areas
 - ⇒ Services provided in the community (within or outside the established CMHC county catchment area), at a location that is outside any of the provider's designated CCBHC geographic county coverage areas.

In addition to accurate NPI information, all CCBHC and CMHC claims must also include the billing provider's service location address as well as a valid place of service (POS) code for the location where the services were rendered. For a complete list of POS codes, see the Centers for Medicare & Medicaid Services (CMS) [Place of Service Code Set](#) webpage at [cms.gov](https://www.cms.gov).

For general guidance on how to submit claims, see the [Claim Submission and Processing](#) provider reference module.

Submitting CCBHC claims

All claims with encounter codes that fall within the CCBHC scope of services must be billed under the provider's registered CCBHC NPI. The following conditions apply when submitting CCBHC claims.

- When a service that falls within the scope of CCBHC services is rendered at a designated CCBHC location within the designated geographic coverage area of a CCBHC, the CCBHC must submit the claim using their registered CCBHC NPI as the billing provider NPI (field 33a of the CMS-1500 claim form or equivalent electronic professional claim field):
 - ⇒ **Be sure the address of the site associated with the specific location where the service was provided is included in field 33 (or equivalent electronic field).** This ensures that services delivered within the CCBHC's designated geographic service area are billed correctly.
 - ⇒ CCBHC claims for services rendered at the CCBHC facility should include the appropriate POS code.
- For CCBHC services provided somewhere other than a clinic location within the community, providers must bill using the NPI, taxonomy and address (including ZIP Code+4) of the clinic location **from which the staff originates**. In addition:
 - ⇒ The POS code must reflect the location where the services are rendered. For example, if providing services in the member's private place of residence, POS code 12 – *Home* should be used.
 - If an exact address is available for the off-site location where the service was provided, that address may be entered in field 32 of the CMS-1500 claim form. For claims submitted electronically, the applicable Service Facility Location ID may be entered. If this information is included, it must be exact, as any inaccuracy will cause the claim to be denied.

Providers should not list multiple locations in field 32 on a single claim. A separate claim may be submitted for each service location. Please note that CCBHCs that submit separate claims on the same date of service to indicate separate locations where services are provided will be denied for those additional claims. *Please refer to the [Claim Submission and Processing](#) provider reference module for appropriate use of POS codes and field 32 details.*



Submitting CMHC claims

CMHC providers that do not have any service locations enrolled as a CCBHC must follow the same POS code requirements described in this bulletin when billing. The applicable NPI for CMHC providers in all circumstances where CMHC services are being provided is the provider's CMHC NPI.

QUESTIONS

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