



# INDIANA HEALTH COVERAGE PROGRAMS

## PROVIDER REFERENCE MODULE

Division of Mental Health and  
Addiction

# Behavioral and Primary Healthcare Coordination Service

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# Table of Contents

<b>Section 1: Introduction .....</b>	<b>1</b>
Background .....	1
Overview .....	1
Provider Controlled, Owned or Operated Residential Settings .....	2
BPHC Policies and Procedures .....	2
1634 State .....	3
<b>Section 2: Behavioral and Primary Healthcare Coordination Overview .....</b>	<b>5</b>
BPHC Service Program .....	5
Service Location .....	5
Requirements for Covered Activities .....	6
Noncovered Activities .....	7
<b>Section 3: BPHC Service Providers .....</b>	<b>9</b>
Provider Agency Requirements .....	9
Provider Agency Application .....	9
Provider Agency Expectations .....	10
Provider Staff Requirements for Care Coordination Service Delivery .....	11
Licensed Professional .....	11
Qualified Behavioral Health Professional .....	12
Other Behavioral Health Practitioner .....	12
Other Qualified Staff Members .....	12
<b>Section 4: Home- and Community-Based Residence Requirements .....</b>	<b>15</b>
BPHC Members and Residential Facility Standards and Expectations .....	15
BPHC Resident Rights and Responsibilities .....	16
Newly Identified Setting .....	17
DMHA-Certified Residential Facility Settings and Definitions .....	17
Supervised Group Living Facility .....	18
Transitional Residential Services Facility .....	18
Semi-Independent Living Facility .....	18
Alternative Family for Adults Program Homes .....	19
Setting Exception Requirements .....	19
State Monitoring .....	20
Member Transition Plan (MTP) .....	20
Incident Reporting .....	20
<b>Section 5: BPHC Member Eligibility Criteria .....</b>	<b>23</b>
Conflict of Interest and Eligibility Determinations .....	23
BPHC Service Member Eligibility Criteria .....	23
Target-Group Criteria .....	23
Needs-Based Criteria .....	24
Financial Criteria .....	24
Other Criteria .....	24
<b>Section 6: Member Application for BPHC .....</b>	<b>27</b>
Referrals for BPHC .....	27
Activities Required Prior to Creating a BPHC Application .....	27
Provider Requirements for Client Incorporated Evaluations .....	28
Evaluation for BPHC Member Eligibility .....	28
Incomplete BPHC Application .....	29
Providing Written Statement of Rights .....	30
Proposed BPHC Plan of Care .....	30
DARMHA Data Auto-Populated on BPHC Application .....	30

Submission of the BPHC Application Packet .....	31
SuperUser Review .....	34
Saving BPHC Application .....	34
Application to BPHC Pending Discharge From Institutional Setting .....	34
Application to BPHC Before 19th Birthday .....	35
Application to BPHC Prior to Member Eligibility Determination .....	35
Tracking BPHC Application Status .....	37
<b>Section 7: Completing the HCBS Residential Setting Screening Tool.....</b>	<b>39</b>
HCBS Residential Setting Screening Tool.....	39
Accessing and Using the Residential Setting Screening Tool (RSST) .....	40
<b>Section 8: Behavioral Health Assessment Tool (ANSA) and BPHC Eligibility .....</b>	<b>41</b>
BPHC Clinical Eligibility and ANSA Ratings.....	41
Additional Medical and Coordination Indicators.....	41
<b>Section 9: Individualized Integrated Care Plan (IICP) Development for BPHC Service .....</b>	<b>45</b>
Staff Requirements.....	45
Freedom of Choice.....	45
Informed Choice of Providers.....	46
Person-Centered Plan of Care Development.....	46
Applicant's Refusal to Sign the IICP .....	47
Ongoing IICP Review .....	48
<b>Section 10: SET Determination of BPHC Service Eligibility – Initial BPHC Application .....</b>	<b>49</b>
BPHC Clinical Eligibility Review Process .....	49
Financial and Nonclinical Eligibility Determination .....	50
Authorization of the BPHC Service .....	51
Denial of BPHC Eligibility .....	51
BPHC Eligibility and Authorization Effective Dates.....	52
Applicant's Discharge Before BPHC Eligibility Determination.....	52
<b>Section 11: BPHC and IHCP Services Eligibility and Authorization.....</b>	<b>53</b>
BPHC and MRO Service Authorization .....	53
BPHC and AMHH Service Authorization .....	54
Lapses in IHCP Coverage – Impact on Service Authorization .....	54
<b>Section 12: BPHC Eligibility Period and Renewal of Eligibility .....</b>	<b>57</b>
BPHC Renewal Process .....	57
Administrative Renewals .....	58
Prior Authorization .....	58
A Loss or Interruption of BPHC Service .....	59
Termination of BPHC .....	59
<b>Section 13: Clinical and Administrative Documentation.....</b>	<b>61</b>
General Documentation Requirements .....	61
BPHC Member Home- and Community-Based Settings Requirements .....	62
<b>Section 14: Behavioral and Primary Healthcare Coordination Service .....</b>	<b>65</b>
Service Delivery.....	65
Program Standards .....	66
Billing for Clinical Supervision of BPHC Service Activities .....	67
Exclusions .....	67
BPHC HCPCS Codes.....	67
Limitations .....	68
1915(c) Home- and Community-Based Services (HCBS) Waivers.....	68
Utilization of HCBS Benefit.....	69
<b>Section 15: Quality Assurance and Performance Measures.....</b>	<b>71</b>
Overview of Activities .....	71

Corrective Action .....	71
<b>Section 16: Fair Hearings and Appeals .....</b>	<b>73</b>
Appeal and Fair Hearing Rights .....	73
Requesting an Appeal .....	73
<b>Section 17: Grievances and Complaints .....</b>	<b>75</b>
<b>Section 18: BPHC Service Billing .....</b>	<b>77</b>
Billing Standards .....	77
Claim Form .....	78
Facility Fees .....	78
BPHC and the Healthy Indiana Plan .....	78
Time Documentation .....	78
Rounding Minutes to Units .....	79
15-Minute Unit .....	79
Modifiers for BPHC Service .....	79
Provider Modifiers .....	79
Third-Party Liability Requirements .....	79
Financial Oversight .....	79
HCBS Audits .....	79
FSSA Audit Oversight .....	80
Medicaid Fraud Control Audit Overview .....	80
Place of Service Codes .....	80
Mailing Address for Claims .....	81
Additional Addresses and Telephone Numbers .....	81
<b>Appendix A: BPHC Acronyms and Definitions .....</b>	<b>83</b>
<b>Appendix B: BPHC Application Screen Shots .....</b>	<b>91</b>
<b>Appendix C: CMHC Provider Application and Attestation to Provide BPHC .....</b>	<b>95</b>
<b>Appendix D: BPHC Application Status Codes .....</b>	<b>97</b>
<b>Appendix E: BPHC Application Report .....</b>	<b>99</b>
<b>Appendix F: Residential Setting Screening Tool .....</b>	<b>101</b>
RSST Information and Definitions .....	101
General Information and Instructions .....	101
Definitions of Settings .....	102





# Section 1: Introduction

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## Background

The Medicaid waiver program began in 1981 in response to persons residing in nursing facilities that were Medicaid funded but would have been capable of living at home or in a community residential setting if additional supportive services were available, as well as the states' needs to reduce nursing home cost. In the past, Medicaid paid only for institutional long-term care services, such as nursing facilities and group homes.

The Centers for Medicare & Medicaid Services (CMS) recognizes that the design and operational features of the Medicaid State Plan Home- and Community-Based Services (HCBS) vary depending on the specific needs of the target population, the resources available to the state, service delivery system, state goals and objectives, and other state specific factors. A state has the flexibility to design a program that is cost-effective, person-centered and employs a variety of social and medical service options.

Indiana applies to the CMS for permission to offer Medicaid waivers and Medicaid State Plan HCBS programs. The Medicaid State Plan HCBS use federal Medicaid funds (plus state matching funds) for HCBS as an alternative to institutional care, under the condition that the overall cost of supporting people in the home or community is, on average, less than the institutional cost for supporting the same population.

The overall thematic goals of HCBS are to provide individuals with meaningful, culturally competent and necessary services and support to live and receive care in their community of choice, to respect the individual's personal beliefs and customs, and to ensure that services are cost effective.

## Overview

Medicaid State Plan HCBS allows the Indiana Health Coverage Programs (IHCP), the state of Indiana's Medicaid program, to provide services in an individual's home or other community setting that would ordinarily be provided in an institution.

The Indiana Family and Social Services Administration (FSSA) has overall responsibility for the Medicaid State Plan HCBS. Day-to-day administration and operation of individual programs are delegated to divisions within the FSSA.

The Division of Mental Health and Addiction (DMHA) offers two Medicaid State Plan HCBS programs:

- Adult Mental Health Habilitation (AMHH)
- Behavioral and Primary Healthcare Coordination (BPHC)

Information about these two programs is available on the Mental Health Services [Adult 1915i Programs](https://www.in.gov/fssa/dmha) webpage at [in.gov/fssa/dmha](https://www.in.gov/fssa/dmha).

Home- and community-based settings will integrate the following organizational components to ensure individuals are served in a community based on the need of each individual as identified in the Individualized Integrated Care Plan (IICP):

- The setting is integrated and supports full access of individuals to the greater community, including opportunities to seek employment and work in competitive integrated settings, engage in community life, and control personal resources.
- The setting is selected by the individual from among setting options, including non-disability-specific settings, and an option is provided for a private unit in a residential setting. Setting options

are documented in the person-centered plan and are based on the individual's needs and preferences. For residential settings, options are selected from available resources.

- The setting ensures an individual's right of privacy, dignity and respect, and freedom from coercion and restraint.
- The setting optimizes individual autonomy and independence in making life choices.
- The setting facilitates individual choice regarding services and support.

## Provider Controlled, Owned or Operated Residential Settings

The HCBS program does not exclude provider controlled, owned or operated settings, such as residential facilities or group homes from participating in HCBS. However, in addition to meeting the general components regarding community-based settings listed above, residential settings must meet the following additional conditions:

- A lease or other legally enforceable agreement to protect from eviction
- Privacy in their unit including entrances lockable by the individual (only appropriate staff may have keys as needed)
- Choice of roommates/living situation
- Freedom to furnish and decorate their unit
- Control of their schedule and activities
- Access to food at any time
- Physical accessibility for the individual
- Visitors allowed at any time

If any of these requirements are limited, the reasons must be documented in the IICP and meet the following:

- Be based on a specific and individualized need
- Include the informed consent of the individual
- Have an established time limit for the modification, including a periodic review

## BPHC Policies and Procedures

This module documents the policies and procedures for the 1915(i) adult benefit provided through the Behavioral and Primary Healthcare Coordination (BPHC) program. State and federal requirements for BPHC service providers, eligibility determination, enrollment, service delivery, clinical documentation and billing are also presented. This module is intended to be used in conjunction with the following resources:

- [Indiana State Plan Amendment \(SPA\)](#) 23-0024 approved by the CMS
- [1915\(b\)\(4\) Waiver](#) for the BPHC approved by the CMS
- *Indiana Administrative Code* [405 IAC 5-21.8](#) (Indiana rule for administration of BPHC)
- IHCP policies and expectations issued by the Indiana FSSA Office of Medicaid Policy and Planning (OMPP), including [IHCP Provider Reference Modules](#) and updates from [IHCP Bulletins](#) on the IHCP provider website at [in.gov/medicaid/providers](http://in.gov/medicaid/providers)

- BPHC service information, including updates, policy revisions and requirements for BPHC service providers issued by the FSSA Division of Mental Health and Addiction (DMHA) on the [Behavioral and Primary Healthcare Coordination](https://in.gov/fssa/dmha) webpage at [in.gov/fssa/dmha](https://in.gov/fssa/dmha)

BPHC-approved providers are required to review, understand and follow BPHC service policies and procedures, as well as any subsequent updates or revisions issued by the CMS, DMHA or OMPP. Failure to comply with state and federal regulations associated with this program and the expectations outlined in the provider module will lead to formal corrective actions, state and federal sanctions, and/or loss of approval as a BPHC provider.

## 1634 State

States that have completed a “1634 agreement” with the Social Security Administration (SSA) are known as 1634 states. As an agency in a 1634 state, the IHCP accepts all SSA determinations of disability under the Social Security Disability Insurance (SSDI) program and automatically enrolls individuals determined eligible for Supplemental Security Income (SSI) benefits by the SSA. The following applies:

- Individuals receiving SSI benefits are enrolled in Medicaid automatically.
- The state accepts SSA determinations of disability.
- Individuals with incomes of up to 100% of the federal poverty level (FPL) who are aged, blind or disabled are transitioned from spend-down to full Medicaid eligibility.
- The spend-down provision is discontinued.
- The income thresholds for the Medicare Savings Program, which provides Medicare cost-sharing assistance, are increased.



## Section 2: Behavioral and Primary Healthcare Coordination Overview

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The Behavioral and Primary Healthcare Coordination (BPHC) program was designed to help individuals with behavioral health diagnoses and co-occurring physical healthcare needs manage their care by providing logistical support, advocacy and education. In coordinating these needs, the goal is to empower BPHC members to remain integrated in the community. The BPHC program is targeted toward individuals who meet the BPHC eligibility criteria (see [Section 5: BPHC Member Eligibility Criteria](#) for additional information) and who would not otherwise qualify for Medicaid or other third-party reimbursement for the intense level of services needed to function safely in the community.

### BPHC Service Program

The BPHC service program offers one service, *Behavioral and Primary Healthcare Coordination*, which consists of coordinated healthcare activities to manage the behavioral health/addiction and physical healthcare needs of eligible members. The service includes logistical support, advocacy and education to assist individuals in navigating the healthcare system, and activities that help members gain access to needed physical and behavioral health services to manage their health conditions.

BPHC is not designed to meet all a member's needs, but merely to assist in the coordination of primary and behavioral/addiction and physical healthcare services for the eligible member. BPHC members are eligible for Medicaid and to receive all Medicaid-covered services for which they qualify. BPHC is compatible with Traditional Medicaid, *Healthy Indiana Plan (HIP) State Plan Plus*, *HIP State Plan Basic*, Hoosier Care Connect, Hoosier Healthwise or Indiana PathWays for Aging (PathWays).

BPHC is intended for individuals with high-risk and severe behavioral health needs who are not otherwise eligible for Medicaid, HIP, Hoosier Care Connect, Hoosier Healthwise or PathWays. No one is prohibited from applying for BPHC; however, individuals who are already Medicaid-eligible will have continued access to services similar in nature to BPHC, such as Medicaid Rehabilitation Option (MRO) and Adult Mental Health Habilitation (AMHH) case management, and care coordination. Service units for BPHC are approved in conjunction with these other complementary programs; therefore, individuals would not receive additional service units or benefits by applying for BPHC.

*Note: BPHC helps eligible individuals manage their physical and behavioral health. Community mental health centers (CMHCs) provide support such as help in scheduling appointments with doctors, guiding on communicating more effectively with doctors, and following doctors' instructions on medications or other recommendations.*

### Service Location

BPHC is a Home- and Community-Based Services (HCBS) program. In accordance with federal regulations for 1915(i) State Plan HCBS programs, service activities are to be provided within the member's home (place of residence) or other locations based in the community. Service activities cannot be provided in an institutional setting.

In January 2014, the Centers for Medicare & Medicaid Services (CMS) published regulations to better define the settings in which states can provide Medicaid HCBS. The HCBS settings final rule became effective March 17, 2014. Information about the HCBS settings final rule as well as additional guidance and fact sheets are available on the [Home and Community Based Services](#) webpage at cms.gov.

In accordance with the CMS final rule on HCBS, a service setting must exhibit the following qualities to be an eligible site for delivery of HCBS:

- Is integrated in and supports full access to the greater community
- Is selected by the member from among setting options
- Ensures member's rights to privacy, dignity and respect, as well as freedom from coercion and restraint
- Optimizes autonomy and independence in making life choices
- Facilitates choice regarding services and providers

Additional requirements for provider-owned or controlled home- and community-based residential settings include:

- The member has a lease or other legally enforceable agreement providing similar protections.
- The member has privacy in their unit, including lockable doors, choice of roommates, and freedom to furnish or decorate the unit.
- The member controls their own schedule, including access to food at any time.
- The member can have visitors at any time.
- The setting is physically accessible.

The following are examples of settings that are **not** considered home- or community-based:

- Nursing facility
- Institution for mental diseases
- Intermediate care facilities for individuals with intellectual disabilities (ICF/IID)
- Hospital
- Jail/correctional facility
- Any other location that has the qualities of an institutional setting, including, but not limited to:
  - A setting located in a building that is also a publicly or privately operated facility that provides inpatient institutional treatment
  - A setting located on the grounds of or adjacent to a public institution, as defined in *Code of Federal Regulations 42 CFR 435.1010*
  - Any other setting that has the effect of isolating members receiving Medicaid HCBS from the broader community of individuals not receiving Medicaid HCBS

## Requirements for Covered Activities

For an activity to be reimbursable under the BPHC service, it must meet the following minimum criteria:

- Be provided to an individual determined by the State Evaluation Team (SET) to be eligible for BPHC
- Be a service proposed on the member's Individualized Integrated Care Plan (IICP) and approved by the SET
- Be a BPHC service activity provided in a manner that is within the scope and/or limitations of BPHC, including provider qualifications, as described in this provider document

- Be supported in clinical documentation as a service or service activity that continues to promote stability for the BPHC member and enables the member to move toward obtaining the treatment and healthcare goals identified in the member's IICP

## Noncovered Activities

The following activities are considered *noncovered* and are *not eligible for reimbursement* under the BPHC service (see [Section 14: Behavioral and Primary Healthcare Coordination Service](#) for additional exclusions and limitations):

- A service and/or service activity provided to the member at the same time as another service that is the same in nature and scope, regardless of funding source, including federal, state, local and private entities (for example, MRO)
- A service provided while the member is in an institutional or non-community-based setting
- A service activity that is provided in a manner that is not within the scope and/or limitations of the BPHC service program
- A service or service activity that is not documented as a covered or approved service on the member's Indiana Family and Social Services Administration (FSSA) Division of Mental Health and Addiction (DMHA)-approved IICP
- A service and/or service activity not supported by documentation in the member's clinical record
- A service and/or service activity provided that exceeds the limits within the service definition, including service quantity/limit, duration and frequency
- Activities billed under Behavioral Health Level of Need (LON) redetermination
- Activities billed under MRO Case Management
- Activities billed under AMHH Care Coordination
- The actual or direct provision of medical services or treatment, including but not limited to medical screenings such as blood pressure screenings or weight checks
- Activities billed under MRO or AMHH medication training and support
- Individual, group or family therapy services
- Activities billed under crisis intervention services
- Time spent on the initial assessment, referral and IICP





## Section 3: BPHC Service Providers

Behavioral and Primary Healthcare Coordination (BPHC) is delivered to eligible members by enrolled Medicaid providers. To become a BPHC provider, the potential provider must first be approved by the Indiana Family and Social Services Administration (FSSA) Division of Mental Health and Addiction (DMHA) and be enrolled in the Indiana Health Coverage Programs (IHCP), under the FSSA Office of Medicaid Policy and Planning (OMPP), as an approved BPHC provider agency. The approval is gained by meeting specific provider standards and criteria developed to ensure that BPHC members receive access to a full continuum of behavioral health services, provided in a manner that ensures the health and safety of those members.

### Provider Agency Requirements

Community mental health centers (CMHCs) are the exclusive providers for BPHC, as authorized by the Centers for Medicare & Medicaid Services (CMS) under a 1915(b)(4) waiver. Any CMHC that wishes to become a BPHC provider agency must complete and submit a *CMHC Provider Application and Attestation to Provide Behavioral and Primary Healthcare Coordination* for review and approval by the DMHA. All BPHC providers must meet the following provider agency criteria and standards:

- In accordance with the federal CMS-approved 1915(b)(4) waiver, be a DMHA-certified CMHC in good standing with the DMHA and the OMPP, including adherence to criteria required of all DMHA-certified CMHCs
- Has acquired and maintains a national accreditation by an entity approved by the DMHA
- Is an enrolled state IHCP (Indiana Medicaid) provider that offers a full continuum of care (see the [Provider Enrollment](#) provider reference module at [in.gov/medicaid/providers](https://www.in.gov/medicaid/providers))
- The CMHC attests that it is willing and able to provide BPHC service as described in the Medicaid-approved State Plan Amendment (SPA) and in this BPHC provider reference module. This criterion includes but is not limited to:
  - Must maintain documentation in accordance with Medicaid requirements defined under *Indiana Administrative Code 405 IAC 1.1-1-1* and *405 IAC 1.1-3-1*.
  - Must meet all BPHC provider agency criteria, as defined in the CMS-approved SPA and *405 IAC 5-21.8* of the *Indiana Administrative Code*.
  - Must employ provider staff eligible to provide BPHC service (see the [Provider Staff Requirements for Care Coordination Service Delivery](#) section for additional provider staff requirements).

*Note: Because CMHCs are deemed eligible to become BPHC provider agencies, DMHA and OMPP approval of interested CMHCs is required. Becoming a BPHC provider is contingent upon the provider agency meeting all BPHC provider requirements and standards.*

### Provider Agency Application

To become a BPHC provider agency, the CMHC must submit a *CMHC Provider Application and Attestation to Provide Behavioral and Primary Healthcare Coordination*, acknowledging the agency will adhere to the BPHC service program policies and state requirements for all BPHC service providers, as described in this section. (See [Appendix C: CMHC Provider Application and Attestation to Provide BPHC](#) for a sample form.) The completed provider application should be returned to the DMHA director's office for review and approval or denial.

The DMHA documents approval or denial of the CMHC's application to become a BPHC provider agency. If the applicant is approved as a BPHC provider agency, the DMHA will notify the IHCP to add BPHC to the existing CMHC provider profile. Approvals are valid for up to three years (unless otherwise determined by the DMHA). Where possible, the DMHA aligns the BPHC provider agency renewal process with the routine CMHC certification timeline. Ongoing CMHCs that are approved to provide BPHC need to ensure compliance with the rules and regulations noted in the CMS [Indiana State Plan Amendment Attachment 3.1-i-C for 1915\(i\) Home and Community-Based Services Programs for Behavioral and Primary Healthcare Coordination 23-0024](#) and *Rule 405 IAC 5-21.8* for BPHC. If approved as a BPHC provider agency, the CMHC will have "Specialty 612 – 1915(i) BPHC Service Provider" added to its profile.

## Provider Agency Expectations

DMHA and OMPP approval of a BPHC provider agency is contingent upon that agency complying with all Medicaid and BPHC rules and policies. In addition to meeting BPHC provider agency requirements, the DMHA or the OMPP mandates that all BPHC provider agencies ensure that members are provided access to all the services and support needed to meet their individualized needs. Agencies approved to provide BPHC service activities are subject to the enforcement provisions in *405 IAC 1-1.4-4*.

BPHC provider agencies must adhere to the following:

- Ensure that all staff providing BPHC to members meet all standards and qualifications required for BPHC activity being provided. CMHCs are responsible for maintaining accurate and up-to-date files for each staff member, including but not limited to proof of BPHC training.
- Provide information related to the delivery of BPHC, members and provider staff, as required or requested by the DMHA.
- Actively participate in the DMHA and the OMPP quality assurance (QA) program, ensuring compliance with all performance criteria set forth for BPHC (as required by the state, the agency shall participate in any quality improvement (QI) initiatives as they relate to BPHC).
- Participate in BPHC provider agency meetings, conference calls and trainings provided or authorized by the DMHA or the OMPP.
- Comply with the DMHA policy regarding the reporting of critical incidents.
- Provide a system throughout the agency and network for handling individual complaints and appeals, including informing members of the availability of the toll-free DMHA Consumer Service Line (800-901-1133) for reporting complaints to the state.
- Cooperate fully with the processing of any BPHC-related complaint or appeal, including any corrective action plan (CAP) initiated by the state.
- Be compliant with all federal *Health Insurance Portability and Accountability Act (HIPAA)* and *Code of Federal Regulations (CFR) 42* mandates and regulations regarding consumer privacy and information sharing.
- Meet all clinical and operational standards and state requirements for a DMHA-certified CMHC.
- Maintain written policies and procedures for timely intake, screening and comprehensive evaluation to ensure that members have access to appropriate mental health and addiction treatment services in a timely manner from the point the provider agency receives a referral for BPHC.
- If a BPHC provider agency is unable to provide the BPHC service, the provider agency is required to assist the member in selecting and ensuring linkage to a new BPHC-approved provider agency.
- Reapply for approval as a BPHC provider agency every three years, from the date of initial approval as a BPHC provider agency or as determined by the DMHA or OMPP.

- In addition to DMHA requirements for [BPHC provider agencies](#), all IHCP-enrolled providers must ensure compliance with rules and requirements specific to IHCP providers, which can be found on the [IHCP Provider Reference Modules](#) webpage at [in.gov/medicaid/providers](http://in.gov/medicaid/providers).

## Provider Staff Requirements for Care Coordination Service Delivery

According to *Indiana Administrative Code 405 IAC 5-21.8-8*, BPHC activities under *subsection (b)(1)* through *(b)(3)* and *b(4)(A)* must be delivered by provider staff who are one of the following:

- Licensed professional
- Qualified behavioral health professional (QBHP)
- Other behavioral health professional (OBHP)

With the exception of those activities specified in the IAC reference above, provider staff delivering BPHC services must be one of the following:

- A licensed professional
- QBHP
- OBHP
- Certified Peer Support Professional (CPSP)
- Integrated health technicians (IHTs)

*Note: Certified recovery specialist (CRS) still appears in 405 IAC 5-21.8-8, but this title has been updated to Certified Peer Support Professional (CPSP).*

CMHCs must be approved by the DMHA to become a BPHC provider agency. Licensed professionals, QBHPs and OBHPs employed by the BPHC provider agency may be eligible to provide all the activities covered under the BPHC service. DMHA-certified CPSPs and integrated health technicians (IHTs) employed by BPHC-approved CMHCs may provide some of the activities within the BPHC service.

A [DMHA-approved BPHC provider agency](#) must ensure that the staff providing the BPHC service to members meets the specific criteria and standards required for the BPHC service activity being provided.

### ***Licensed Professional***

A *licensed professional* is defined as any of the following providers:

- Licensed physician (including licensed psychiatrist)
- Licensed psychologist or a psychologist endorsed as a health service provider in psychology (HSPP)
- Licensed clinical social worker (LCSW)
- Licensed mental health counselor (LMHC)
- Licensed marriage and family therapist (LMFT)
- Licensed clinical addiction counselor (LCAC), as defined under *Indiana Code IC 25-23.6-10.5*

## ***Qualified Behavioral Health Professional***

A *qualified behavioral health professional (QBHP)* is defined as any of the following providers:

- An individual who has had at least two years of clinical experience treating persons with behavioral health diagnosis under the supervision of a licensed professional, as previously defined, such experience occurring after the completion of a master's degree and/or doctoral degree in any of the following disciplines:
  - In psychiatric or mental health nursing from an accredited university, plus a license as a registered nurse (RN) in Indiana
  - In pastoral counseling from an accredited university
  - In rehabilitation counseling from an accredited university
- An individual who is under the supervision of a licensed professional, as previously defined, is eligible for and working toward licensure, and has completed a master's and/or doctoral degree in any of the following disciplines:
  - In social work from a university accredited by the Council on Social Work Education
  - In psychology from an accredited university
  - In mental health counseling from an accredited university
  - In marital and family therapy from an accredited university
- A licensed independent practice school psychologist under the supervision of a licensed professional, as previously defined
- An authorized healthcare professional (AHCP), defined as follows:
  - A physician assistant with the authority to prescribe, dispense and administer drugs and medical devices or services under an agreement with a supervising physician and subject to the requirements of *IC 25-27.5-5*
  - A nurse practitioner (NP) or a clinical nurse specialist (CNS), with prescriptive authority and performing duties within the scope of that person's license and under the supervision of, or under a supervisory agreement with, a licensed physician, pursuant to *IC 25-23*

## ***Other Behavioral Health Practitioner***

An *other behavioral health practitioner (OBHP)* is defined as either of the following providers:

- An individual with an associate or bachelor's degree, or two years equivalent behavioral health experience, meeting minimum competency standards set forth by the behavioral health service provider and supervised by a licensed professional (as previously defined) or QBHP (as previously defined)
- A licensed addiction counselor, as defined under *IC 25-23.6-10.5*, supervised by a licensed professional (as previously defined) or QBHP (as previously defined)

## ***Other Qualified Staff Members***

DMHA CPSPs and IHTs employed by CMHCs may provide some of the activities within the BPHC service. CPSPs and IHTs are not eligible to provide needs assessments, referral and linkage activities or physician consults.

*Integrated health technician (IHT)* refers to an individual who meets the following criteria:

- Has completed the IHT DMHA and Indiana Department of Health (IDOH) state-approved training program
- Receives a passing score on the certification exam

- Is supervised by a licensed professional or QBHP

*Note: Certified recovery specialist (CRS) has been updated and includes the community health worker (CHW), which are now under one certification named Certified Peer Support Professional (CPSP).*

To be certified as a CPSP, an individual must meet the following criteria:

- Be one or both of the following:
  - Individual living in recovery with a mental health and/or substance use condition
  - Family member to another person living with a mental health and/or substance use condition
- Successfully complete DMHA CPSP training and receive a passing score on the certification exam.

A CPSP is supervised by a Certified Peer Supervisor, a licensed professional or QBHP (as defined in this section) and remains in good standing. Rule changes are forthcoming to reflect updates to the certification. For more information, see the [Indiana Certified Peer Support Professionals](https://in.gov/fssa/dmha) webpage at [in.gov/fssa/dmha](https://in.gov/fssa/dmha).

*Note: Certified IHTs and CSPCs are not permitted to complete the needs assessment, provide referral and linkage activities, or physician consults in the BPHC.*

*A CPSP eligible for reimbursement as a BPHC provider staff member must complete the DMHA/Indiana Department of Health (IDOH) state-approved training and receive a passing certification exam score.*



## Section 4: Home- and Community-Based Residence Requirements

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Behavioral and Primary Healthcare Coordination (BPHC) is a Home- and Community-Based Services (HCBS) program. In accordance with federal regulations for 1915(i) State Plan HCBS programs, service activities must be provided within the individual's home (place of residence) or at other locations based in the community. Service activities cannot be provided in an institutional setting. In addition, members must live in residential settings that meet the requirements of the [HCBS settings final rule](#) to be eligible to receive 1915(i) services, including BPHC. See the [Service Location](#) section for additional guidance on HCBS requirements.

### BPHC Members and Residential Facility Standards and Expectations

Many persons eligible for BPHC live in their own home or with families or friends in the same manner as any adult who does not have a behavioral health diagnosis. Due to the eligibility criteria for BPHC, some persons seeking these services do not have family or friends with whom they can live or are not functioning at a level where their health and safety can be supported in a totally independent setting. Depending on the person's level of need (LON) and functioning, they may choose to live in a full-time supervised setting, a setting that provides less than full-time supervision or a setting that provides no on-site supervision.

Before a member's selection of a residential placement, alternatives are discussed with the member, family and guardian, as applicable. The decision for the choice of residence is based on the member's identified needs, goals and resources. After the member chooses a residence, an Individualized Integrated Care Plan (IICP) is developed or updated with the member. The IICP reflects the member's aspirations and goals toward an independent lifestyle and how the residential setting contributes to empowering the member to continue to live successfully in the community.

The state defines *homelike* as an atmosphere, *to the extent feasible*, with patterns and conditions of everyday life that are as close as possible to those of members without a behavioral health diagnosis. This definition includes an environment designed with the purpose and focus to increase the resident's involvement in decisions that affect their care, daily schedules and lifestyles to be more similar to their peers who live on their own. The overall atmosphere of the setting is conducive to the achievement of optimal development of independence by the residents. The location of the facility must provide residents reasonable access to the community at large, including but not limited to the agency and medical, recreational and shopping areas, by public or agency-arranged transportation.

The Division of Mental Health and Addiction (DMHA) supports a permanent supportive housing model, which refers to a housing unit that is linked with community-based services. The tenant holds the lease with a landlord and receives services based on need through a community mental health center (CMHC). The tenant's housing is not contingent upon the person participating in any mental health or addiction services. The member has, at a minimum, the same responsibilities and protections from eviction that tenants have under the landlord tenant law of the state, county, city or other designated entity. Each member's essential personal rights to privacy, dignity and respect, as well as freedom from coercion and restraint are protected.

The DMHA expects the following standards to be maintained for BPHC members living in a DMHA-approved residential setting:

- Approved residential settings can be individual/single occupancy dwellings or residences that support multiple individuals.

- DMHA-certified residential settings in which some members may choose to live will promote opportunities to assist and support each member to grow and develop skills needed to continue to live in the community.
- While the resident is in a DMHA-certified residential facility, the provider is responsible for ensuring the resident's involvement in decisions that affect their care, daily schedules and lifestyle.
- The overall atmosphere of the setting is conducive to the achievement of optimal independence, safety and development by the resident, with their input.
- The location of the facility must provide residents full access to the community at large, including but not limited to, the agency and medical, recreational and shopping areas by public or agency-arranged transportation.
- The location, design, construction and furnishings of each residence must be consistent with a family or personal home (homelike).
- The majority of services and behavioral healthcare are provided in locations outside the residence, such as in the community at large or in a clinic setting.
- Residents are afforded the opportunity to engage in community-based programs that assist them in achieving goals, including employment.

The DMHA has created an [HCBS Member Information Pamphlet](https://www.in.gov/fssa/dmha) at [in.gov/fssa/dmha](https://www.in.gov/fssa/dmha) that helps explain the settings requirements for HCBS programs to members interested in selecting these services.

## BPHC Resident Rights and Responsibilities

Under *Indiana Administrative Code 405 IAC 5-21.8*, BPHC members living in a DMHA-certified residential setting have the following rights:

- The environment is safe.
- Each resident is free from abuse and neglect.
- Each resident is treated with consideration, respect and full recognition of the resident's dignity and individuality.
- Each resident is free to communicate, associate and meet privately with persons of the resident's choice, as long as the exercising of these rights does not infringe upon the rights of another resident, and any restriction of this right is a part of the resident's individual treatment plan.
- Each resident has the right to confidentiality concerning personal information, including health information.
- Each resident is free to voice grievances and to recommend changes in the policies and services offered by the agency.
- Each resident has the right to manage personal financial affairs or to seek assistance in managing them unless the resident has a representative payee or a court-appointed guardian for financial matters.
- Each resident shall be informed about available legal and advocacy services and may contact or consult legal counsel at their own expense.
- Each resident shall be informed of the number for the DMHA toll-free Consumer Service Line (800-901-1133).
- Each resident shall begin receiving the BPHC service in a timely manner from the date of approval for service.
- Each resident has the right to privacy in their sleeping or living unit.



- Each resident has the right to units with lockable entrance doors, and only appropriate staff having keys to doors.
- When sharing living units, each resident has a choice of roommates.
- Each resident has the freedom to furnish and decorate their sleeping or living units.
- Each resident is able to have visitors of their choosing at any time.
- The setting is physically accessible to each resident.
- Each resident will be free from restraints, coercion, restrictive interventions and seclusion.
- Each resident shall have the freedom and support to control their own schedule and activities and have access to food at any time.

Any modification of the resident's rights must be supported by a specific assessed need and documented in the person-centered treatment plan (IICP).

## Newly Identified Setting

When a provider identifies a new setting they want to make HCBS compliant, the provider is required to notify the DMHA at [DMHAAdultHCBS@fssa.in.gov](mailto:DMHAAdultHCBS@fssa.in.gov) to begin the assessment process. If the setting was established prior to March 17, 2014, and is currently serving HCBS-enrolled members, then the setting should have become HCBS compliant by March 17, 2019. If the setting was established after March 17, 2014, HCBS services can neither be delivered at that setting nor can any Adult Mental Health Habilitation (AMHH) or BPHC enrolled member reside in the setting until the DMHA assesses the setting and deems it in full HCBS compliance. The only exception to this guidance is newly established provider owned, controlled or operated (POCO) residential settings that have not previously been occupied. The DMHA will determine the status of previous occupation.

## DMHA-Certified Residential Facility Settings and Definitions

Members residing in a DMHA-certified residential facility setting described in this section are eligible to receive the BPHC service. These community residential settings are designed to provide an array of living options that span the continuum from minimal oversight to highly supervised settings. The DMHA, through certification and licensure standards, requires the member's participation in planning their care and supports the recovery philosophy that promotes the least restrictive and most appropriate care to safely meet the member's identified needs and preferences.

The DMHA-certified residential care settings are designed to be a component of an outpatient community-based continuum of care. These settings are not nursing facilities, intermediate care facilities for individuals with an intellectual disability (ICF/IIDs) or institutes for mental diseases (IMDs). The residential care settings do not have any qualities of an institution, nor would the settings be permitted to be located in a building that is also a publicly or privately operated facility that provides inpatient institutional treatment; or in a building on the grounds of, or immediately adjacent to, a public institution; or any other setting that has the effect of isolating members from the broader community. One of the primary goals of BPHC is to provide care coordination to members to ensure that they live safely and as independently as possible in the community. The service intends to provide opportunities for members to meet their needs in community-based settings and to prevent need for and placement in institutional settings.

The DMHA and Office of Medicaid Policy and Planning (OMPP) have a strong partnership with state housing agencies: the Indiana Housing and Community Development and the Corporation for Supportive Housing. Together, these agencies have facilitated the development of supportive housing integrated into the community to meet the needs of members with mental health and addiction disorders.

The DMHA-certified residential settings in which some members may choose to live will promote opportunities that assist and support each member to grow and develop skills needed to continue to live in the community. The DMHA-certified residential living facilities include:

- Supervised group living (SGL) facilities
- Transitional residential services (TRS) facilities
- Semi-independent living program (SILP) facilities defined under *Indiana Code IC 12-22-2-3*
- Alternative family for adults (AFA) program homes operated solely by resident householders

### ***Supervised Group Living Facility***

A *supervised group living* (SGL) facility is defined by the DMHA as a residential facility that provides a therapeutic environment in a homelike setting to persons with psychiatric disorders or addictions who need the benefits offered in a group living arrangement as post-psychiatric hospitalization intervention or as an alternative to hospitalization. *Therapeutic living environment* means a living environment, in which the staff and other residents contribute, that presents no physical or social impediments to the habilitation and rehabilitation of the resident.

An SGL setting is designed to assist individuals in the recovery process by offering safe, supportive homelike environments. Individuals may come and go as needed to attend work, school, treatment appointments, recreation and other activities in the community. On-site supervision is required 24 hours a day, seven days a week in this setting. Although individuals have access to food 24 hours a day, seven days a week, there are also typically planned mealtimes where individuals may eat together. Menus are developed by dietitians to provide healthy meals consistent with each individual's dietary needs and restrictions (for example, diabetic, low sodium). Alternative food is available if an individual chooses not to eat the planned meal. Consumers are given opportunities for input in the meal-planning process.

A certified SGL facility may serve up to 10 consumers in a single-family dwelling and up to 15 consumers in an apartment building (three or more living units) or in a congregate residence.

### ***Transitional Residential Services Facility***

A *transitional residential services* (TRS) facility is defined by the DMHA as a 24-hour-per-day setting that provides food, shelter and other support services to individuals with psychiatric disorders and/or addictions, who are in need of a short-term supportive residential environment.

Individuals in this type of setting are provided with less than 24-hour supervision. Individuals have input into household activities and may come and go as needed to attend work, school, treatment appointments, recreation and other community activities. Although individuals have access to food 24 hours a day, seven days a week, there are typically planned mealtimes where individuals may eat together. Consumers are given opportunities for input in the meal-planning process. Menus are designed by dietitians to provide healthy meals that are consistent with each individual's dietary needs and restrictions (for example, diabetic, low sodium). Alternative food is available if an individual chooses not to eat the planned meal. Individuals in this setting are likely preparing for, or already participating in, work or school activities. A certified TRS facility serves 15 or fewer persons.

### ***Semi-Independent Living Facility***

A *semi-independent living program* (SILP) facility is defined by the DMHA as:

- A facility that is not licensed by another state agency and serves six or fewer individuals per residence who have a psychiatric disorder or an addiction, or both, who require only limited supervision

- A facility in which the agency provides a resident living allowance to the resident, or owns, leases or manages the residence

Individuals in this type of setting are provided with a minimum of one hour per week of resident supervision. These settings are typically homelike. Individuals have input into household activities and may come and go as needed to attend work, school, treatment appointments, recreation and other community-related activities. While individuals have access to food 24 hours a day, seven days a week, there are typically planned mealtimes where individuals may eat together. Individuals are given opportunities for input in the meal-planning process. Menus are designed by dietitians to provide healthy meals that are consistent with each individual's dietary needs and restrictions (for example, diabetic, low sodium). Alternative food is available if an individual chooses not to eat the planned meal. This setting is intended to prepare individuals for independent living settings.

### ***Alternative Family for Adults Program Homes***

An *alternative family for adults (AFA)* program home is defined by the DMHA as a home that serves six or fewer individuals who have psychiatric disorders or addictions, or both, and reside with an unrelated householder.

Individuals in this type of setting are provided with a minimum of two hours per month of resident supervision. These settings are homelike. Individuals have input into household activities and may come and go as needed to attend work, school, treatment appointments, recreation and other community-related activities. While individuals have access to food 24 hours a day, seven days a week, there are typically planned mealtimes where individuals may eat together. Individuals are given opportunities for input in the meal-planning process. Alternative food is available if an individual chooses not to eat the planned meal. This setting is intended to prepare individuals for independent living settings or may become permanent housing if this best meets the individual's needs and a less-restrictive setting is not wanted or deemed appropriate by the individual or treatment team.

### ***Setting Exception Requirements***

In accordance with *Code of Federal Regulations 42 CFR 441.301(c)(4)(F)*, *441.530(a)(vi)(F)* and *441.710(a)(vi)(F)*, the DMHA will use the following process to support individuals who seek living situations that are not eligible with HCBS settings final rule:

- (F) Any modification of the additional conditions, under §441.301(c)(4)(vi)(A) through (D), must be supported by a specific assessed need and justified in the person-centered service plan. The following requirements must be documented in the person-centered service plan:
  - (1) Identify a specific and individualized assessed need.
  - (2) Document the positive interventions and supports used prior to any modifications to the person-centered service plan.
  - (3) Document less intrusive methods of meeting the need that have been tried but did not work.
  - (4) Include a clear description of the condition that is directly proportionate to the specific assessed need.
  - (5) Include regular collection and review of data to measure the ongoing effectiveness of the modification.
  - (6) Include established time limits for periodic reviews to determine if the modification is still necessary or can be terminated.
  - (7) Include the informed consent of the individual.
  - (8) Include an assurance that interventions and supports will cause no harm to the individual

Although the policy in item 6 does not specify a specific time limit for periodic review, the DMHA will invoke a minimum 90-day review to fulfill this requirement.

The DMHA and OMPP will maintain the final determination on whether these eight requirements are sufficiently fulfilled. If the final determination is approved, the DMHA and OMPP reserve the right to

change the status at any time if it is determined that the plan is not adhered to. Any modification to the plan will require additional approval from the DMHA.

## State Monitoring

The state retains the authority to monitor and enforce the adherence to standards by conducting on-site visits to ensure compliance with standards and respond to any complaint or incident reported. In addition to consumer feedback and site visits, data is collected and analyzed. There are also facility requirements for compliance with fire and safety codes, which must be kept up to date. The state will conduct site visits to ensure standards are met. Individuals residing in any DMHA-certified residential setting have the freedom to choose how they live, and residents' rights are respected and honored.

All settings in which an HCBS member resides or receives HCBS services must fully comply with the CMS HCBS settings final rule regulation. For this reason, setting assessments are not limited to only those that are POCO residential settings, or controlled or operated by CMHC. The AMHH and BPHC provider agencies must ensure that HCBS members in all POCO and non-POCO residential settings also meet the intent of the regulation. The DMHA State Evaluation Team (SET) will make the final determination of the setting compliance.

As part of the Ongoing Monitoring phase, the SET conducts on-site visits to a percentage of each agency's POCO settings that have been identified as a setting that provides HCBS services. In addition to the site visits, the Centers for Medicare & Medicaid Services (CMS) requires a supplemental provider self-assessment. The provider self-assessment document will only be completed for the sites identified in the annual Ongoing Monitoring notification letter.

## Member Transition Plan (MTP)

Member Transition Plans (MTPs) are required for all individuals receiving HCBS residing in a setting that has received a final designation of non-HCBS compliant. An MTP must include one of the following:

- A plan to transition to a compliant HCBS setting
- A plan for members that choose to discontinue HCBS and remain in a noncompliant HCBS setting

MTPs assist members and providers in identifying, exploring and deciding what changes must be made as a result of HCBS compliance implementation, particularly with regard to continuation of HCBS and/or potential relocation from the member's current residence. In these cases, an MTP will be developed by the responsible provider agency, collaboratively with the member and the member's family/guardian/caretaker. The member's decision to discontinue receiving HCBS and continue to live at the HCBS noncompliant residential setting, or to relocate to an HCBS-compliant residential setting, must be documented in the MTP.

## Incident Reporting

Incident reports must be completed and submitted according to the timelines specified in the instructions on the *Critical Incident Report* form that was sent to each agency electronically. Following the form instructions, the provider needs to complete only *one* setting/benefit section but must complete *all* areas of consumer status before submitting the report to the DMHA.

All critical incident reports are submitted via the online [DMHA Provider Portal](#). The online form includes the option for providers to select from the following types of incidents per setting:

- HCBS Residential Setting
  - Medication error resulting in consultation with poison center, hospital or urgent care or death
  - Seclusion and restraint

- Suicide attempt
- Serious bodily injury
- Death
- Fire/explosion requiring local Fire Department response
- Law enforcement involvement
- Emergency rendering the residence temporarily or permanently uninhabitable
- Physical abuse, sexual abuse, or emotional abuse
- Neglect and/or self-neglect
- Exploitation, including financial exploitation
- Elopement
- Other
- Private/Independent setting
  - Medication error resulting in consultation with poison center, hospital, or urgent care or death
  - Seclusion and restraint
  - Suicide attempt
  - Serious bodily injury
  - Death
  - Law enforcement involvement
  - Physical abuse, sexual abuse, or emotional abuse
  - Neglect and/or self-neglect

The BPHC box must be selected as one of the services received by the individual to identify the individual as a BPHC consumer.



## Section 5: BPHC Member Eligibility Criteria

The Behavioral and Primary Healthcare Coordination (BPHC) service is offered as a part of a Medicaid State Plan option for providing 1915(i) Home- and Community-Based Services (HCBS) to promote and empower independence and integration into the community and as an alternative to an institutional level of care (LOC). The 1915(i) option allows Indiana to offer HCBS to individuals who meet specific target-group, needs-based and financial eligibility criteria.

### Conflict of Interest and Eligibility Determinations

To ensure there is no conflict of interest in the BPHC eligibility determination, the responsibility for the BPHC service clinical eligibility and approval of BPHC service, in all cases, is retained by the Indiana Family and Social Services Administration (FSSA) Division of Mental Health and Addiction (DMHA) State Evaluation Team (SET). Members of the SET are prohibited from having any financial relationships with the applicant or member requesting BPHC service, the families or the provider agency selected to provide BPHC service.

BPHC service provider agencies are required to have written policies and procedures available for review by the state that clearly define and describe how conflict-of-interest requirements are implemented and monitored within the agency to protect individuals applying for BPHC service and the integrity of the BPHC service.

### BPHC Service Member Eligibility Criteria

Indiana has elected to target the 1915(i) State Plan HCBS benefit for a specific population, as defined in *Indiana Administrative Code 405 IAC 5-21.8*, in the BPHC State Plan Amendment (SPA) and in this section of this module. An eligible member undergoes an evaluation that is conducted either face-to-face or via telehealth (according to Indiana Administrative Code) with the required credentialed staff of a DMHA-approved BPHC service provider agency. The SET assesses the BPHC application to determine if the individual meets the BPHC eligibility criteria described in this section. See [Section 6: Member Application for BPHC](#) for additional information regarding the BPHC service evaluation process.

#### ***Target-Group Criteria***

To be eligible for BPHC, an individual must meet the following target-group criteria:

- Is 19 years old or older
- Has been diagnosed with a BPHC-eligible primary behavioral health diagnosis. The eligible diagnoses list includes, but is not limited to, the following general categories:
  - Schizophrenic disorder
  - Major depressive disorder
  - Bipolar disorder
  - Delusional disorder
  - Psychotic disorder

*Note: Eligibility for the BPHC service requires at least one qualifying diagnosis. For the most up-to-date list of qualifying ICD-10 diagnosis codes, see Behavioral and Primary Healthcare Coordination Codes, accessible from the [Code Sets](#) webpage at [in.gov/medicaid/providers](https://in.gov/medicaid/providers).*

## Needs-Based Criteria

Based on the behavioral health clinical evaluation, referral, supporting documentation and DMHA-approved behavioral health assessment tool results, the applicant must meet all the following needs-based criteria:

- Demonstrated needs related to management of the member's behavioral and physical health
- Demonstrated impairment in self-management of physical and behavioral health services
- A health need that requires assistance and support in coordinating behavioral and physical health treatment
- A recommendation for intensive community-based care, based on the uniform DMHA-approved behavioral health assessment tool, as indicated by a rating of 3 or higher

*Note: If an individual appears to meet target- and needs-based criteria for the BPHC service but is not enrolled in Medicaid, the following application steps are recommended to be completed simultaneously:*

- 1) Submit BPHC application to the DMHA for clinical eligibility determination.*
- 2) Link applicant with the FSSA Division of Family Resources (DFR) to submit a Medicaid application.*
- 3) Link applicant to the Social Security Administration (SSA) for a disability evaluation.*

## Financial Criteria

Determination of financial eligibility is conducted by the DFR. If an individual meets the criteria for being determined disabled, an increased income limit may be applied for the financial criteria determination. Individuals deemed disabled must have countable income at or up to 300% above the federal poverty level (FPL). These income limits are updated annually when the federal government releases the new FPL standards. Annual updates can be accessed in the [Federal Register](https://www.federalregister.gov) at federalregister.gov. The updates are typically published in late January and become effective in March or April. There are certain income disregards that may be applied, which may lower countable income. There is no asset limit for the program. For any individual who is not deemed disabled, standard Medicaid eligibility criteria is applied to determine eligibility. Information on the changes to aged, blind or disabled Medicaid members is available on the [FSSA website](https://www.in.gov/fssa) at in.gov/fssa.

## Other Criteria

To be eligible for BPHC, an individual must reside in a home- or community-based setting that is compliant with the requirements of the HCBS settings final rule (see [Section 4: Home- and Community-Based Residence Requirements](#)). Each setting must be assessed independently to determine if an applicant resides in a community-based setting. Individuals in institutional settings are not eligible for BPHC. However, BPHC applications can be initiated by the community mental health center (CMHC) in advance of an individual's discharge as part of the discharge planning process (see [Section 6: Member Application for BPHC](#)).

Additionally, individuals must meet all other Medicaid eligibility requirements such as citizenship and state residency requirements, as determined by the DFR. An application to the SSA must be filed for the IHCP to complete the eligibility process. For individuals who have an SSA disability determination, the state will use this determination for Medicaid eligibility purposes. Individuals considered disabled by the SSA will be considered disabled by the IHCP.



Note: [Healthy Indiana Plan](#) (HIP) members who are deemed medically frail are enrolled in HIP State Plan Plus or HIP State Plan Basic. These members may apply for the BPHC service through the normal BPHC application process. If they are found to meet BPHC clinical and nonclinical eligibility criteria, they will be transitioned out of HIP and enrolled under fee-for-service Medicaid to receive BPHC. For all financial eligibility questions, contact the DFR.

[Hoosier Care Connect](#) members who meet the needs-based criteria may be eligible to participate in BPHC.

[Hoosier Healthwise](#) members age 19 or older who meet the needs-based criteria may be eligible to participate in BPHC.

[Indiana PathWays for Aging \(PathWays\)](#) members who meet the needs-based criteria may be eligible to participate in BPHC.

An applicant not meeting the target-group, needs-based, financial and other criteria as previously defined will not be eligible to receive the BPHC service under the 1915(i) State Plan HCBS program. When applicable, the CMHC shall facilitate linkage to alternative services that may meet the applicant's needs.



## Section 6: Member Application for BPHC

For an individual to receive the Behavioral and Primary Healthcare Coordination (BPHC) service, a BPHC provider agency, in collaboration with the individual seeking the service, must submit a BPHC application packet to the Indiana Family and Social Services Administration (FSSA) Division of Mental Health and Addiction (DMHA) in the manner required by the FSSA Office of Medicaid Policy and Planning (OMPP) or DMHA. This section outlines the referral and application processes used to assist DMHA in determining an applicant's clinical eligibility for the BPHC service.

### Referrals for BPHC

Referrals for the BPHC service may come from any source within the community, including but not limited to:

- Community mental health centers (CMHCs) or other treatment providers may identify individuals who appear to meet the eligibility criteria.
- Individuals may notify their provider of an interest in the BPHC service.
- An individual's family members or caregivers may inquire about the service and assist the individual in contacting a DMHA-approved BPHC provider agency.

Information about BPHC may be obtained from BPHC service provider agencies, as well as on the Indiana DMHA [Behavioral and Primary Healthcare Coordination](https://in.gov/fssa/dmha) webpage at [in.gov/fssa/dmha](https://in.gov/fssa/dmha). The website provides a summary of the eligibility criteria and notes all BPHC service provider agencies and the locations where potential enrollees may go to apply, as well as how to access a BPHC assessment.

If an individual seeking the BPHC service contacts the state for information, the interested individual will be referred to the DMHA-approved [BPHC provider agencies](#) within the state that are authorized to assist the applicant with information about BPHC. These providers will help the individual complete the application and evaluation required to determine BPHC service eligibility.

Only the DMHA-approved BPHC provider agencies may submit BPHC applications. The BPHC provider agency reviews the eligibility criteria and service options with an individual interested in exploring BPHC as a treatment option. Together, the individual and provider will determine whether to complete an application for BPHC. The BPHC service will not be eligible for reimbursement for any individual who has not completed the BPHC application process, been determined clinically eligible for the service by the DMHA State Evaluation Team (SET) and determined eligible for the Indiana Health Coverage Programs (IHCP) by the FSSA Division of Family Resources (DFR).

*Note: The BPHC service is not eligible for reimbursement for any individual who has not been determined clinically eligible by the DMHA and IHCP-eligible by the DFR.*

### Activities Required Prior to Creating a BPHC Application

Before a BPHC application is created in the Data Assessment Registry Mental Health and Addiction (DARMHA) system, several activities must be completed and documentation that the activities have occurred must be retained in the applicant's clinical record. These activities include:

- A qualified BPHC assessor must perform a comprehensive biopsychosocial assessment face-to-face or via telehealth, according to Indiana Administrative Code.
- A qualified Adults Needs and Strengths Assessment (ANSA) user must conduct an interview with the member (either face-to-face or via telehealth, according to Indiana Administrative Code) and

must complete a level of need (LON) assessment within 60 days prior to the submission of the BPHC application, which needs to be submitted in the DARMHA system.

- The HCBS Residential Setting Screening Tool (RSST) (see [Section 7: Completing the HCBS Residential Setting Screening Tool](#)) must be completed with the applicant, and the [HCBS Member Information Pamphlet](#) must be provided to the applicant.

## Provider Requirements for Client Incorporated Evaluations

Only DMHA-approved BPHC provider agencies may conduct the clinical evaluation required for the BPHC application process. Additionally, the BPHC provider agency must ensure that the agency staff member providing the clinical evaluation meets the following minimum qualifications:

- Conducts the evaluation with the involvement of the client either face-to-face or via telehealth as described in the [Telehealth and Virtual Services](#) provider reference module.
- Possesses at least a bachelor's degree in social sciences or related field, with two or more years of clinical experience.
- Has completed the DMHA or OMPP-approved training for BPHC, which provides an overview of the service and application process. (It is the responsibility of the CMHC to ensure that appropriate documentation demonstrating compliance with training requirements is in the staff file.)
- Is a certified ANSA user receiving supervision from an ANSA SuperUser.

## Evaluation for BPHC Member Eligibility

Before completing the BPHC application process, the DMHA-approved BPHC provider staff will discuss the benefits and purpose of BPHC with the applicant. Next, the provider will assist in identifying whether the applicant meets the BPHC eligibility criteria. If the applicant is interested in pursuing an application for BPHC, the BPHC provider will work with the applicant to complete the application process.

Each BPHC applicant must undergo a biopsychosocial evaluation and needs assessment **and** the DMHA-approved behavioral health assessment – the ANSA (face-to-face or via telehealth according to Indiana Administrative Code). The evaluation includes the following:

- Review, discussion and documentation of the applicant's strengths, needs, desires and goals, specific to the mental health/substance abuse and physical health needs identified by the applicant
- Review of psychiatric symptoms and how they affect the applicant's functioning and ability to attain desires and goals, as well as the applicant's ability to self-manage behavioral and physical healthcare services

*Note: The BPHC clinical assessment must be an individualized contact with a qualified provider staff member. The assessment may be conducted in conjunction with or separately from the ANSA assessment.*

- Review of the applicant's health issues and need for support and assistance to manage them due to behavioral health needs
- Identification of any physical health conditions that the applicant is having difficulty managing due to behavioral health needs
- Review and verification that the primary behavioral health diagnosis is current and accurate and is an eligible BPHC diagnosis

- Completion of an ANSA, if one has not been administered within the last 60 days. Although the person completing the BPHC clinical evaluation described previously in this list must have a bachelor's degree with two or more years of clinical experience, the ANSA for the BPHC application may be completed by any BPHC provider staff member, who is certified by the DMHA to complete the ANSA.

*Note: The state has not defined specific medical conditions required for an individual to be eligible for BPHC; rather, the individual must have an eligible primary behavioral health diagnosis that impacts their ability to manage physical health matters. Evidence of being unable to manage physical health matters could include issues such as lack of an established medical home, frequent emergency room visits, need for a physical or ongoing preventive care, or inability to self-manage any prescribed medications.*

The evaluation also explores and includes documentation on the following:

- Applicant's living situation to ensure that it meets BPHC criteria (see [Section 5: BPHC Member Eligibility Criteria](#) for additional information)
- Documentation that provides support and justification for the applicant's co-existing physical healthcare needs, and the need for support and assistance to manage them due to their behavioral health needs (See the [Additional Medical and Coordination Indicators](#) section for more information.)
- Documentation of current needs and strengths to support the need for the service
- Indication of how BPHC service activities will be utilized to support the client in goal achievement
- Documentation of any waivers the client is currently on
- Documentation of the physical health services necessary to assist the applicant in remaining in the community (for example: primary care, specialty care and so on)

## Incomplete BPHC Application

All required fields must be filled out on the BPHC application, or it will not be accepted. If all fields are completed but there is insufficient or inconsistent information for a clinical determination to be made, the SET may deny or pend the application and request additional information from the BPHC provider agency, as described in [Section 10: SET Determination of BPHC Service Eligibility – Initial BPHC Application](#). If the application is placed in the pending status, and the required information is not submitted in the DARMHA within seven calendar days of the SET's request, the BPHC application will be subject to denial. However, the provider agency may submit an updated BPHC application at a later date for team consideration. To ensure no conflict of interest in the BPHC clinical eligibility determination, the DMHA SET shall retain the authority to determine an applicant's clinical eligibility for the BPHC service and authorization to utilize the BPHC service.

*Note: Applications placed in pending status must be updated as directed and resubmitted within seven calendar days, or the application will be subject to denial.*

## Providing Written Statement of Rights

The BPHC provider staff ensures a written statement of rights is provided to each BPHC applicant and member. The statement includes:

- The toll-free Consumer Service Line, 800-901-1133, and the telephone number for Indiana Disability Rights 317-722-5555 or toll-free at 800-622-4845
- Documentation that agency staff has provided both a written and an oral explanation of these rights to each applicant or member

## Proposed BPHC Plan of Care

The agency provider staff and the applicant jointly develop a proposed Individualized Integrated Care Plan (IICP) that includes identified strengths, needs, the applicant's desired goals and choice of provider agency. The IICP also includes the proposed BPHC activities deemed necessary to address the documented goals. The state also requires documentation, signed by the applicant or member that attests to the following:

- The applicant has been given choice of providers.
- The applicant has been given choice of services.
- The proposed IICP is individualized to meet the applicant's needs.
- The applicant has participated in the development of the IICP.
- A copy of the IICP that was submitted with the application was offered to the applicant and/or legal guardian.
- Program requirements, including financial requirements, have been reviewed with the applicant.
- The HCBS Residential Setting Screening Tool (RSST) has been completed with the applicant, a signed copy retained in the clinical record and the [HCBS Member Information Pamphlet](#) was provided to the applicant.

See [Section 9: Individualized Integrated Care Plan \(IICP\) Development for BPHC Service](#) for additional information regarding person-centered planning and the BPHC IICP requirements and expectations.

## DARMHA Data Auto-Populated on BPHC Application

The BPHC application auto-populates with certain data points entered in DARMHA. Consumer demographics cannot be entered into the BPHC application and must be correct in the DARMHA record before completing and submitting an application. Therefore, before submitting the BPHC application packet through DARMHA as described in this section, the BPHC provider agency must review the information entered into DARMHA. If errors are found in the DARMHA data, the errors must be corrected before submitting the BPHC application to ensure accurate information is submitted for review and to prevent an erroneous denial of BPHC eligibility.

*Note: Before submitting the BPHC application, all information entered into DARMHA must be reviewed. Any identified errors in DARMHA data must be corrected before submitting the application. The ANSA must also be completed in DARMHA before submission.*

The following data points are auto-populated in the BPHC application from DARMHA data:

- DARMHA ID
- Applicant's first and last name

- Date of birth
- Age
- Diagnosis
- Medicaid ID (also referred to as the IHCP Member ID or RID) (if applicable)
- Social Security number
- ANSA completed within 60 days
- ANSA LON

If a BPHC application is initiated in DARMHA and any of the following issues are present, a red “X” will appear on the BPHC application:

- An ANSA has not been completed within 60 days.
- ANSA LON is less than 3.
- The individual is under age 19.
- There is no BPHC-eligible behavioral health diagnosis.

If the red “X” is generated due to an error in the DARMHA data (for example, the individual is 19 years or older, but the date of birth is incorrect in DARMHA), the BPHC provider agency shall update the information in DARMHA before submitting the BPHC application.

## Submission of the BPHC Application Packet

Only a DMHA-approved BPHC provider agency may submit a BPHC application. The BPHC application includes a brief assessment of an individual’s ability to manage their healthcare, a proposed IICP and supporting documentation. The BPHC provider staff facilitates completion of the BPHC application packet with the applicant through a web-based process. The BPHC application is available through DARMHA and must be completed and submitted in its entirety before the DMHA will render a determination of eligibility for the applicant. The application includes check boxes for attestations that the required documents are attached and the required actions have occurred. Signed attestations and clinical documents must be maintained in the clinical record and available for review by the state as requested. See [Appendix B](#) for an example of the BPHC application.

The following is required for a complete BPHC application submission via DARMHA:

- *Applicant Information:* All applicant demographic information (with the exception of home address, email address and telephone number) is auto-populated from DARMHA and must be verified and corrected in DARMHA before submitting the BPHC application; the current home address (physical address; a Post Office (P.O.) Box can be listed also if physical address listed) and telephone number must be entered in the BPHC application (This address is where the consumer’s BPHC approval or denial notice will be sent. Therefore, it is critical that this information is accurate. Consumers should be asked the preferred address to receive BPHC notices. When the consumer is homeless or does not have an address to provide, the CMHC address can be entered, if the consumer consents).
- *HCBS Waiver:* Consumers must be asked if they are participating in any other HCBS waiver or state plan service (as described further in [Section 14: Behavioral and Primary Healthcare Coordination Service](#), BPHC service providers are responsible, in collaboration with waiver providers, for monitoring services of individuals enrolled in a 1915(c) waiver to prevent service duplication)

The BPHC provider must select from the following options:

- Community Integration and Habilitation Waiver
- Family Supports Waiver

- Health and Wellness Waiver
- Indiana PathWays for Aging (PathWays) Waiver

*Note: The Health and Wellness Waiver and Indiana PathWays for Aging (PathWays) Waiver were formerly identified as the Aged and Disabled Waiver.*

- Traumatic Brain Injury Waiver
- Money Follows the Person
- Unknown whether consumer is on waiver

*Note: This option should be selected only if the question has been asked of the applicant, and they are uncertain. All BPHC applicants must be asked this question.*

- Consumer is on a waiver, unsure which waiver
- Not on a waiver

*Note: BPHC service providers are responsible, in collaboration with waiver providers, for monitoring services of BPHC members also enrolled in a 1915(c) waiver to prevent service duplication.*

- **Current Living Situation:** The radio button next to the applicable current living situation, as described in this section, is entered on the application:

#### Community-Based Settings

- **Homeless:** A person is considered homeless if they lack a fixed, regular and adequate nighttime residence, or their primary nighttime residence is one of the following:
  - A supervised publicly or privately operated shelter designed to provide temporary living accommodations for a period of three months or less
  - An institution that provides a temporary residence for individuals intended to be institutionalized
  - A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings (for example, on the street)
- **Private/Independent Home:** A “private home” is a residence owned or leased by the member, or a member’s relative, for private personal use
- **Non-Provider Owned, Controlled or Operated (POCO) Residential Setting**
- **Non-CMHC POCO Residential Setting**
- **POCO Residential Setting**
- **Potential Presumed Institutional Setting**

#### Institutional Settings

- **Nursing Home:** 24 hours a day, seven days a week care in a skilled nursing facility
- **Hospital:** 24 hours a day, seven days a week care in an inpatient psychiatric hospital, psychiatric health facility (such as a stress center), general hospital, private adult psychiatric hospital, Veterans Affairs (VA) hospital, state-operated facility (SOF) or transitional care hospital
- **Institution for Mental Disease (IMD):** 24 hours a day, seven days a week care in an IMD
- **Intermediate Care Facility for Individuals with Intellectual Disability (ICF/IID):** 24 hours a day, seven days a week care in an ICF/IID
- **Jail/Correctional Facility:** Home detention, detention centers, work release, weekend jail, boot camp, jail, correctional facility, prison

Individuals in institutional settings are not eligible for BPHC; however, BPHC applications can be initiated in advance of an individual’s discharge to community-based living as part of the discharge planning process (see the [Application to BPHC Pending Discharge from Institutional Setting](#) section). After selecting a radio button from institutional setting under current living situation, information on the anticipated discharge date must be documented. A date box will appear if one of



the radio buttons is selected. The discharge date must be in the format of mm/dd/yy and must be within 30 days of discharge when completing the application.

- **Eligible Behavioral Health Diagnosis:** The applicant's eligible primary BPHC diagnosis is selected from the drop-down box; the applicant's associated symptoms are listed in the box below the drop-down box.
- **Physical Health Issue(s):** The applicant's current physical health issues for which they need assistance in accessing and/or coordinating care are listed in this section. (In addition, the following examples can be used in place of no medical diagnosis: if the applicant hasn't seen a medical doctor or there is no actual diagnosis, but the applicant states their believed issues.)
- **Justification of Need for Program:** Information about how the applicant's behavioral health condition impedes their ability to manage their physical health issues must be documented in this section.
- **Goals:** Information in the applicant's own words stating their goals for physical and behavioral stability that promotes movement toward independence and continued community integration must be documented in this section.
- **Objectives:** Information about the necessary steps that the applicant must take to accomplish their behavioral and/or physical health goals from the goals section must be documented in this section.
- **Strategies:** Information about how the BPHC service will assist the applicant in meeting their identified goals is listed in this section.
- **BPHC Service Activities:** Providers are to identify the date when the BPHC service (T1016 UC and/or T1016 UC U3) activity was provided during the current eligibility period and a brief description of the service. (If BPHC service was not used during the current Individualized Integrated Care Plan [IICP] service package date, the provider must document why the approved service was not utilized by the applicant **and** what the agency will do to engage member into Care Coordination.) *(Used for provider renewal application only)*
- **Contact Person:** The primary contact and alternate contact at the CMHC for the BPHC application and, if applicable, the individual's legal guardian must be entered on the application. (This information includes the person's name, email address and telephone number. BPHC clinical denial notifications are sent to both agencies contact email addresses provided. Any DMHA SET inquiries are also directed to the listed individuals.)
- **BPHC IICP:** The needs statement, goals related to addressing the need for BPHC, BPHC objectives and strategies are entered on the application. This information must be focused on helping the individual manage their physical and behavioral health needs. The goals on the application should be specific, realistic, measurable, attainable and in the applicant's own words. BPHC must be one of the strategies, with explicit information on how BPHC will assist in meeting the individual's needs and goals. (See [Section 9: Individualized Integrated Care Plan \(IICP\) Development for BPHC Service](#) for additional information on the IICP requirements.)
- **Health Questions:** The four health questions must be scored. (See [Section 8: Behavioral Health Assessment Tool \(ANSA\) and BPHC Eligibility](#) for additional information.)
- **BPHC Attestations:** Included in the application is the required acknowledgement that the following attestations have been fulfilled and signed; the date the signatures or verbal attestations were obtained from the applicant, legal guardian (if applicable), referring care coordinator and ANSA SuperUser must be entered on the application; and BPHC provider agencies must maintain the actual documentation with signatures in the clinical record or via a written narrative confirming that verbal attestation was obtained from the applicant:
  - **Choice of Providers:** Verification that the applicant was informed of their right to provider choice, received a randomized list of eligible service providers and was given the freedom to select the DMHA-approved provider to deliver the BPHC service documented on the proposed IICP

- *Choice of Services:* Verification that the applicant is choosing to apply for the BPHC service
- *IICP Development:* Provider or applicant's attestation that the proposed IICP is individualized to meet the applicant's needs and the applicant is requesting the activities and supports listed on the proposed IICP
- *Applicant Participation:* Applicant's attestation verifying their participation in the development of the IICP and determination of which behavioral care and healthcare services and/or activities will be included on the plan of care, including the BPHC service
- *Copy of the IICP:* Verification that a copy of the IICP that was submitted with this application was offered to the applicant and/or legal guardian
- *Program Requirements:* Verification that program requirements, including financial eligibility requirements, have been reviewed with the applicant
- *Residential Setting Screening Tool (RSST) and HCBS Pamphlet:* Verification that applicant resides in a HCBS-compliant setting and the [HCBS Member Information Pamphlet](#) was provided to the applicant

*Note: If the applicant has been assigned a legal guardian, the legal guardian **must** provide attestation and signature on the application.*

## ***SuperUser Review***

An ANSA SuperUser must review and attest to the accuracy and quality of the ANSA associated with each BPHC application. The SuperUser review must be proven by being documented in a progress note or signed, printed and dated on the attestation.

## ***Saving BPHC Application***

While completing the BPHC application, the BPHC provider staff must save the application in DARMHA every 15–20 minutes to prevent information from being lost. Additionally, a BPHC application can be saved as a draft before it is submitted to the SET for completion at a later time. The BPHC provider staff entering the application data must document the assigned IICP number to access the saved application at a later time. The IICP number will also be necessary when addressing any application issues or concerns with the SET or DARMHA Help Desk. A BPHC application left in “Draft” status for more than 60 days will be discarded from the DARMHA system.

## **Application to BPHC Pending Discharge From Institutional Setting**

Individuals in institutional settings are not eligible for BPHC. However, BPHC applications can be initiated by the CMHC in advance of an individual's discharge as part of the discharge planning process. Applications may be submitted to the DMHA no more than 30 days in advance of the individual's planned discharge. In the *Description of Living Situation* section of the application, information on the discharge, including the anticipated discharge date and the living situation after discharge, must be included. In some settings, such as state-operated facilities (SOFs), Medicaid eligibility would have also been suspended or terminated while the individual was institutionalized.

The DFR must also be contacted through the normal processes to determine Medicaid eligibility. See the [Application to BPHC Prior to Member Eligibility Determination](#) section for additional information.

## Application to BPHC Before 19th Birthday

BPHC provider agencies may submit the BPHC application 90 days in advance of an individual's 19th birthday. Please note that the application will show a red "X" next to the age; however, the DMHA team will review the date of birth and determine clinical eligibility for a future effective date of the individual's 19th birthday if the application is submitted within this time frame.

Additionally, an ANSA is a required component of the BPHC application. CMHCs will need to submit ANSAs for these individuals, as the individuals may have previously had only a Child and Adolescent Needs and Strengths (CANS) assessment completed. CMHCs are encouraged to assist these individuals to initiate the application process with the DFR and Social Security Administration (SSA). Disability determinations can take up to 90 days, so applications for Medicaid and SSA disability determinations should be initiated well in advance of the individual's 19th birthday. See the following section, [Application to BPHC Prior to Member Eligibility Determination](#), for additional information.

## Application to BPHC Prior to Member Eligibility Determination

If individuals are not actively enrolled in the IHCP (Indiana Medicaid) when they apply for BPHC, an *IHCP* application must be initiated. As part of the IHCP application process, applicants are required to apply for benefits with the SSA. If individuals already have SSA disability determinations, the state will use this determination for IHCP eligibility purposes. The DFR will review the IHCP application and SSA disability determination to determine an individual's IHCP eligibility, based on factors such as state residency, disability status, income and citizenship.

In the case of an individual initiating a BPHC application before submitting an IHCP application, the CMHC shall refer the applicant to the DFR application process. Member IHCP applications can be submitted via the methods outlined in the following table. Online submission is the recommended method.

Table 1 – Methods for Applying to the Indiana Health Coverage Programs

Application Method	Instructions
Online (recommended)	<ol style="list-style-type: none"> <li>Go to the <a href="https://fssabenefits.in.gov/bp">FSSA Benefits Portal</a> at fssabenefits.in.gov/bp.</li> <li>Complete and submit application.</li> </ol>
By mail or fax	<ol style="list-style-type: none"> <li>Go to the <a href="https://fssabenefits.in.gov/bp">FSSA Benefits Portal - Print Application</a> at fssabenefits.in.gov/bp to fill out application and print the application. or Go to the <a href="https://fssabenefits.in.gov/bp">FSSA Benefits Portal - Mail Application</a> at fssabenefits.in.gov/bp to request an application be mailed to you.</li> <li>Make sure the application is complete and return the application to FSSA: <ul style="list-style-type: none"> <li>By mail: FSSA Document Center, PO Box 1810; Marion, IN 46952</li> <li>By fax: 888-436-9199</li> </ul> </li> </ol>
By telephone	Call the DFR at 800-403-0864.
In person at DFR offices	Find the local <a href="#">DFR office</a> at in.gov/fssa/dfr.

The following process applies to individuals who are not actively enrolled in the IHCP when applying for the BPHC with a provider agency:

1. The provider agency completes the ANSA and evaluation, including completion of the BPHC application and the proposed IICP, and submits it through DARMHA for SET review and consideration.
2. The provider agency refers the applicant to the DFR to complete the *Indiana Application for Health Coverage* application and to the SSA for a disability determination.
3. If the SET determines that the applicant does not meet BPHC target-group and needs-based eligibility criteria, a clinical denial notice is sent to the provider and the applicant with the clinical denial decision.
4. If the applicant is deemed to meet target-group and needs-based eligibility for the BPHC service, the SET notifies the DFR of the approved clinical eligibility.
5. The DFR conducts the IHCP eligibility determination, based on *Indiana Application for Health Coverage* (IAHC) information and the SSA disability determination.
6. If the applicant does not meet IHCP eligibility, the DFR notifies the DMHA and issues an eligibility denial notice with appeal rights to the applicant.
7. If the DFR determines the applicant eligible for IHCP coverage, the eligibility approval will be viewable in the Eligibility Verification System (EVS) options (the IHCP Provider Healthcare Portal [IHCP Portal] and interactive virtual assistant [GABBY]); the DFR notifies the DMHA of the approval, and the DFR sends the applicant an eligibility approval notice. (This information is communicated to Gainwell Technologies, which sends the service authorization letter with approved BPHC units and service package start and end dates to the consumer and provider.)

*Note: BPHC service activities provided to an applicant found clinically eligible for the BPHC service are not reimbursable unless a BPHC service authorization is issued, and the individual is determined eligible for the IHCP.*

An individual will not be eligible to receive the BPHC service until both BPHC clinical eligibility and IHCP eligibility have been established. Following submission of the IHCP application, if an individual who was determined to meet the BPHC clinical criteria is determined IHCP-eligible, the applicant is eligible to receive the BPHC service.

A member's Medicaid eligibility effective date may occur prior to the date BPHC clinical eligibility was determined; however, the BPHC service effective start date is not retroactive and will never be earlier than the date the DMHA SET determined the clinical criteria for the program was met. When an IHCP application is received for a person deemed by the DMHA SET to be BPHC clinically eligible, the DFR begins applying the BPHC financial eligibility rules (that is, income at or below 300% of the FPL) to individuals who are aged, blind or disabled, beginning the date the DMHA determined clinical eligibility.

Individuals who do not meet the criteria listed in the previous section (the aged, blind or disabled criteria as determined by DFR) may still be eligible for other IHCP health coverage, such as HIP. See the [Healthy Indiana Plan](https://www.in.gov/fssa) webpage at [in.gov/fssa](https://www.in.gov/fssa).

An individual would have retroactive IHCP coverage only to a date before the BPHC clinical criteria was met if the individual was determined otherwise IHCP-eligible before the BPHC clinical eligibility date. In some cases, IHCP coverage may be retroactive up to 90 days from the date of application, depending on the coverage the member qualifies for and other eligibility criteria. However, BPHC claims billed before the BPHC effective date will be denied.

**Example 1:** An individual who applied for BPHC and the IHCP is determined to meet BPHC clinical criteria on July 3. The individual does not meet the financial criteria for any other IHCP aged, blind or disabled aid category and IHCP eligibility is effective July 1. The BPHC service package assignment begins July 3. The BPHC service will not be reimbursed for dates of service prior to July 3.

**Example 2:** An individual submits an IHCP application and BPHC application July 1. The individual is determined to meet BPHC clinical criteria July 3. When the DFR reviews financial and nonfinancial eligibility, it is determined the individual was otherwise eligible for IHCP coverage the 90 days before the BPHC clinical criteria was met. IHCP coverage will be retroactive to April 1. However, the BPHC service package assignment will still begin on July 3; the BPHC service will not be reimbursed for dates of service prior to July 3. Other IHCP-covered services may be reimbursed for dates of service beginning April 1.

If an individual does not meet nonclinical eligibility criteria as of the date they are determined to meet the clinical criteria by the SET, but is determined by the DFR to meet nonclinical criteria as of the following month, the BPHC service package effective date is set for the future date of the DFR determination.

**Example:** An individual is determined to meet BPHC clinical criteria July 3. The individual does not meet the financial/nonfinancial criteria for IHCP coverage as of this date. The individual is determined to meet the financial/non-financial criteria as of August 1. IHCP and BPHC eligibility are effective Aug. 1. Reimbursement for BPHC and other IHCP services is not available until Aug. 1.

Providers and enrollees receive notification of BPHC eligibility and service authorization, including the effective date and end date, only after both clinical eligibility and nonclinical eligibility have been established. IHCP applications on the basis of disability are required to be processed within 90 days of submission; all other DFR applications are processed within time lines defined by the specific program the member may be eligible for, such as [HIP](#) or [Hoosier Care Connect](#).

## Tracking BPHC Application Status

The status of a BPHC application can be tracked in DARMHA. A full listing of the application status codes is found in [Appendix D: BPHC Application Status Codes](#). The status code is updated whenever a new action is taken on a BPHC application.

Providers are responsible for monitoring the status of each submitted BPHC application to ensure timely processing. Providers must routinely use this status code to track where an application is in the process of program eligibility determination to ensure timely processing of each application. Tracking the progress of a BPHC application is an administrative function, not a BPHC service activity and may not be billed as a BPHC service activity.



## Section 7: Completing the HCBS Residential Setting Screening Tool

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Members who receive care coordination through the Behavioral and Primary Healthcare Coordination (BPHC) are required to live in a setting that meets federal Centers for Medicare & Medicaid (CMS) requirements for Home- and Community-Based Services (HCBS) settings (see [Section 4: Home- and Community-Based Residence Requirements](#) in this module). To ensure that the residential settings in which applicants for BPHC service live are assessed for compliance with the HCBS settings final rule, the BPHC provider agency, in collaboration with the individual seeking services, must complete the HCBS Residential Setting Screening Tool (RSST) developed by the Indiana Family and Social Services Administration (FSSA), Office of Medicaid Policy and Planning (OMPP) and FSSA Division of Mental Health and Addiction (DMHA).

### HCBS Residential Setting Screening Tool

The RSST is intended to help members and providers identify the type of *community-based* setting in which a member lives, assess whether that setting meets HCBS criteria, select the appropriate response for the *Current Living Situation* section of the BPHC application in the Data Assessment Registry Mental Health and Addiction (DARMHA), and provide required information about the compliance status of the setting (see [Section 6: Member Application for BPHC](#) in this module). Members who live in an institutional setting are not eligible to receive BPHC service. Institutional settings are defined as the following:

- *Nursing Home*: 24 hours a day, seven days a week care in a skilled nursing facility
- *Hospital*: 24 hours a day, seven days a week care in an inpatient psychiatric hospital, psychiatric health facility (such as a stress center), general hospital, private adult psychiatric hospital, Veterans Affairs hospital, state-operated facility (SOF) or transitional care hospital
- *Institution for Mental Diseases (IMD)*: A hospital, nursing facility or other institution of **more than 16 beds** that is primarily engaged in providing diagnosis, treatment or care of persons with mental diseases, including medical attention, nursing care and related services
- *Intermediate Care Facility for Individuals with Intellectual Disability (ICF/IID)*: 24 hours a day, seven days a week in an ICF/IID
- *Jail/Correctional Facility*: Home detention, detention centers, work release, weekend jail, boot camp, jail, correctional facility, prison

The RSST must be completed during the assessment process for every BPHC application (initial, renewal or modification) submitted to the DMHA. The RSST must be completed *prior* to creating the BPHC application in DARMHA to ensure that correct information is reported on the BPHC application. A completed copy of the RSST tool, with the member's signature in Section 1, Section 2 or Section 6, must be kept with the member's clinical record, for later review by the DMHA State Evaluation Team (SET). In the event the individual's address changes during the approved package period, an updated HCBS RSST must be submitted to the DMHA SET within 15 days of the change of address.

## Accessing and Using the Residential Setting Screening Tool (RSST)

The most current version of the HCBS RSST is available for download from the “HCBS residential setting screening tool (RSST)” link on the [Home- and Community-Based Services](#) page of the DMHA website at [in.gov/fssa/dmha](http://in.gov/fssa/dmha) (Mental Health Services > Adult 1915(i) Programs > Home- and Community-Based Services). Included with the RSST is a companion document that provides general instructions, definitions of terms used in the tool and additional information for the member and the provider staff completing the tool. Specific instructions and directions are located in each section of the RSST. An example of the RSST form and instructions as well as definitions used in the RSST are located in [Appendix F: Residential Setting Screening Tool](#).



## Section 8: Behavioral Health Assessment Tool (ANSA) and BPHC Eligibility

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The Adult Needs and Strengths Assessment (ANSA) is the Indiana Family and Social Services Administration (FSSA) Division of Mental Health and Addiction (DMHA)-approved behavioral health assessment tool used to identify an applicant's strengths and needs at the time of application and is used to assist in the identification of an individual's level of need (LON) for the Behavioral and Primary Healthcare Coordination (BPHC) service. The assessment tool consists of items grouped into categories and domains that the provider agency staff will assess and discuss with the applicant. The assessment tool may be used in conjunction with the face-to-face or telehealth, according to Indiana Administrative Code, biopsychosocial assessment or in a separate face-to-face or telehealth session. The combined ratings resulting from the completed ANSA tool generate a LON recommendation that may be used to support a recommendation for the BPHC service.

The LON recommendation from the ANSA tool is not intended to be a mandate for the level of services that an individual may be eligible to receive, but a recommendation that is factored into the final clinical eligibility decision made by the State Evaluation Team (SET). There are many factors, including an individual's preferences and choice that influence the actual intensity of the treatment services recommended on the applicant's proposed Individualized Integrated Care Plan (IICP).

*Note: See the following for additional information about the ANSA tool, training, support and certification:*

- DMHA Telephone: 317-232-7907
- The [ANSA Indiana Manual](#) may be found online at [fssa.in.gov](http://fssa.in.gov).

### BPHC Clinical Eligibility and ANSA Ratings

For BPHC clinical eligibility, information in the behavioral health clinical evaluation, referral, supporting documentation and DMHA-approved behavioral health assessment tool results must substantiate that the applicant meets all the following needs-based criteria:

- Demonstrated needs related to management of the member's behavioral and physical health
- Demonstrated impairment in self-management of physical and behavioral health services
- A health need that requires assistance and support in coordinating behavioral and physical health treatment
- A recommendation for intensive community-based care, based on the uniform DMHA-approved behavioral health assessment tool (ANSA), as indicated by a recommendation of a LON of 3 or higher

### ***Additional Medical and Coordination Indicators***

Based on compelling evidence and research indicating there is a significant relationship between behavioral health and physical health, the DMHA has developed indicators that capture the complexity of an individual's physical health needs. The additional items on the application are considered in determining an individual's need for behavioral health and physical healthcare service coordination.

The following medical/physical coordination items are included on the BPHC application to evaluate an individual's complexity of healthcare needs in conjunction with behavioral health needs. The items are

used to help determine the individual's need for assistance and support in coordinating behavioral health and primary healthcare services.

Each item is to be rated using the following guidelines. The item **anchor coding descriptions** are **examples of circumstances** that fit each rating (0, 1, 2 or 3). The descriptions are **not** inclusive. The rater must consider the basic meaning of each rating level to determine the appropriate rating on a dimension (item) for an individual. Additional information related to scoring individual ANSA items may be found in the *ANSA – Indiana | Praed Foundation*.

Table 2 – Rating Guidelines

Rating	Level of Need
0	No evidence of need
1	Significant history or possible need which is not interfering with functioning
2	Need interferes with functioning
3	Need is dangerous or disabling

*Physical/Medical Item:* Captures the individual's needs related to management of their physical health needs.

Rating	Level of Need
	<b>PHYSICAL/MEDICAL</b> <i>This rating includes both acute or chronic health problems and physical conditions.</i>
0	There is no evidence of physical or medical problems.
1	Mild or well-managed physical or medical problems are indicated. This might include well-managed chronic conditions like diabetes or asthma. A person in need of a physical/medical examination would be rated here.
2	Chronic physical or moderate medical problems are present.
3	Severe, life-threatening physical or medical condition exists.

*Medication Management:* Captures the individual's needs related to managing medication regimes for prescribed medication.

Rating	Level of Need
	<b>MEDICATION MANAGEMENT</b> <i>This item focuses on the individual's ability to manage their prescription medication regimen and the impact on their physical and/or mental health symptoms and functioning.</i>
0	There is no evidence that the person has difficulty managing any prescribed medication.
1	Although the individual usually takes medications consistently, they may occasionally stop, skip or forget to take medications without causing instability in the underlying conditions. The individual may benefit from reminders and checks to consistently take medications. <b>OR</b> Individual has significant history of problems managing medication, problems that adversely impacted physical and/or mental health.
2	Over the last year, the person has taken medication inconsistently, had difficulties with side effects or misuses medications. <b>OR</b> The underlying medical or behavioral health conditions are unstable or adversely affect the individual's functioning. <b>OR</b> The individual makes frequent visits to physician or urgent care center within the last year.

Rating	Level of Need
3	Due to the person's inability to self-manage prescribed medications, their mental or physical condition is deteriorating and functioning is severely impaired. Inpatient care may be necessary to stabilize the person's condition. <b>OR</b> This level indicates an individual who has refused to take prescribed psychotropic or physical health care medications during the past 180-day period or a person who has abused their medications to a significant degree (for example, overdosing or over using medications to a dangerous degree).

*Management of Healthcare:* Captures the individual's needs related to understanding and managing physical health needs.

Rating	Level of Need
	<b>MANAGEMENT OF HEALTHCARE:</b> <i>This item focuses on the individual's awareness of co-occurring behavioral and physical health care needs, and individual's ability to manage both.</i>
0	There is no evidence that the person has any co-occurring physical health and mental health conditions nor physical health risk factors (antipsychotic medications, depression, lifestyle risks [smoking, obesity and inactivity], transportation issues, negative symptoms or financial barriers to healthcare). The person recognizes physical and behavioral health issues and risk factors and manages them successfully.
1	The person is aware that they require both physical healthcare and behavioral healthcare, but occasionally has difficulty managing symptoms and health regimens, or making lifestyle changes. Functioning is impaired, such as occasionally missing scheduled appointments; they may benefit from reminders and checks to consistently keep appointments and monitor symptoms.
2	The person has moderate difficulty managing physical or behavioral health care. The person may not consistently follow mental health or physical health care plans or routinely see a primary care physician; may frequently miss scheduled appointments; has interpersonal problems with health care team; faces barriers to accessing comprehensive, coordinated health care (lack of transportation, long wait for appointments, does not understand treatment plans, is not screened for lifestyle risks); or does not make needed lifestyle changes. <b>OR</b> Side effects and related risk factors for poor physical health are not monitored. <b>OR</b> Individual has visited the emergency room (ER) in the last year.
3	The person is poorly managing their healthcare, risking serious or life-threatening complications. The person may not have a primary health care provider who was seen within the last year. <b>OR</b> Individual uses the ER for primary health care. <b>OR</b> Individual refuses or is unable to participate in either physical or behavioral healthcare, is experiencing an exacerbation of the physical or behavioral health condition or may be experiencing complications due to multiple health care conditions. <b>OR</b> External barriers prevent the individual from receiving physical and mental health care. <b>OR</b> Individual has been hospitalized within the past year.

*Coordination of Healthcare:* Captures the individual's needs related to coordination of mental and physical healthcare.

Rating	Level of Need
	<b>COORDINATION OF HEALTHCARE:</b> <i>This item focuses on the need for coordination of physical and mental health for individuals with chronic or acute physical health conditions and behavioral health diagnoses.</i>
0	There is no evidence of a need for coordination of physical and mental health care. Both mental and physical health care are well coordinated and managed by the individual and/or health care team, resulting in stable, healthy functioning.

Rating	Level of Need
1	Mild mental and physical health care coordination issues occasionally occur. Such issues are resolved by the individual or health care team.
2	Moderate need for mental physical care coordination for individual with mental and physical health problems exist. For example, the individual has frequent outpatient or urgent care visits over the past three months in order to stabilize or treat their acute or chronic physical condition or behavioral health condition. <b>OR</b> The individual requires support and coordination of medical and behavioral health issues to increase and maintain stability. <b>OR</b> Individual may not be able to communicate across multiple medical/behavioral health providers. <b>OR</b> Physical health care providers may not understand the individual's mental health needs, attribute physical symptoms to psychological issues, not measure and monitor lifestyle risks, or provide vague treatment instructions.
3	Severe care coordination challenges for individual with mental and physical health may result in dangerous or disabling mental or physical health care outcomes or institutional placement. The individual experiences reoccurring problems with limited periods of stability. <b>OR</b> The individual has any ER visits or inpatient hospitalizations within the last year. <b>OR</b> The individual does not have a primary health care provider or has not seen the primary health care provider within the last year. A state hospital or nursing home admission has been considered. External barriers prevent access to physical health care.

## **Section 9: Individualized Integrated Care Plan (IICP) Development for BPHC Service**

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Person-centered planning is an existing Indiana Family and Social Services Administration (FSSA) Division of Mental Health and Addiction (DMHA) requirement for all provider agencies in Indiana delivering care to individuals impacted by mental health and/or substance abuse challenges. Further, it is a mandated component with the Centers for Medicare & Medicaid Services (CMS) Home- and Community-Based Services (HCBS) [settings final rule](#) in *Code of Federal Regulations 42 CFR 441.301*.

The following concepts are also required within the individualized treatment planning and service delivery:

- The member has the freedom to choose who is included in the Individualized Integrated Care Plan (IICP) planning and development process.
- The member is an active participant in the IICP planning process, indicating their goals and preferences for treatment.
- The member has the right to select the provider agency or individual provider of services and the right to change individual provider/provider agency during the treatment process.
- The process reflects the cultural considerations of the member and is conducted by providing information in plain language and in a manner that is accessible to members with disabilities and persons with limited English proficiency.

This section outlines the Behavioral and Primary Healthcare Coordination (BPHC) requirements for development of the IICP during the BPHC member application process and throughout the member's enrollment in BPHC.

### **Staff Requirements**

All BPHC IICPs must be developed in collaboration with the applicant (either face-to-face or via telehealth) and a DMHA-approved BPHC provider staff meeting the following minimum requirements, as documented in the BPHC rule and State Plan Amendment (SPA) (see [Section 3: BPHC Service Providers](#) for details regarding minimum staffing requirements):

- Licensed professional
- Qualified behavioral health professional (QBHP)
- Other behavioral health professional (OBHP)

### **Freedom of Choice**

The BPHC member has the freedom of choice regarding the following:

- The desired goals and objectives documented on the proposed IICP
- Inclusion of the BPHC activities on the proposed IICP, as supported by the member's documented needs
- The selection of an DMHA-approved providers to deliver the BPHC service

## Informed Choice of Providers

During the BPHC application process, the provider agency is responsible for completing and documenting the following activities intended to educate the applicant regarding informed choice of providers:

- Explanation of the applicant's right to an informed choice of providers (meaning the applicant is informed of their right to interview potential service providers and make their own choice regarding which DMHA-approved BPHC provider agency and service providers will provide the BPHC service documented on the proposed IICP)
- A list of DMHA-approved BPHC provider agencies within the applicant or member's county of residence and contingent counties (during the development of the proposed IICP, the agency staff member generates a list of DMHA-approved BPHC agency providers, in randomized sequence of qualified providers, for the applicant to select from when developing the IICP)
- The applicant is informed that a BPHC provider agency listing is also posted on the [Indiana Health Coverage Programs \(IHCP\) provider website](https://in.gov/medicaid/providers) at in.gov/medicaid/providers. To view the provider listing:
  - Launch the IHCP Provider Locator tool, accessible from the [IHCP Provider Locator](https://in.gov/medicaid/providers) webpage at in.gov/medicaid/providers.
  - Under Provider, select the **Other** radio button and then select **Behavioral Health Provider** from the drop-down list.
  - Under Specialty, select **Behavioral and Primary Healthcare Coordination (BPHC)**.
  - Click **Search** to generate a list of providers.
- The applicant is informed of the right to change a BPHC provider or provider agency at any time during enrollment in BPHC (the current BPHC provider is expected to assist the member in transitioning service delivery to the newly selected BPHC provider)
- Obtain the applicant's signature or verbal attestation, which should be documented in the service note

*Note: Signed documents are not required with BPHC application submissions through the Data Assessment Registry Mental Health and Addiction (DARMHA). However, the signed documents must be maintained in the clinical record and an attestation must be made on the application.*

## Person-Centered Plan of Care Development

The IICPs are to be developed with the member driving the care. The member has authority to determine who is included in the process. IICPs require provider staff and member signatures, as well as clinical documentation of member participation. Development of the proposed BPHC IICP must be a collaborative effort that includes the applicant/member, identified community supports, family and nonprofessional caregivers and the individuals and agency staff involved in assessing and providing care for the applicant/member. The IICP integrates all components and aspects of care that are:

- Clinically indicated and deemed medically necessary
- Supported by the member's identified needs
- Provided in the most appropriate, least restrictive setting to achieve the applicant or member's goals

The provider agency staff must ensure that the IICP development is driven by a *person-centered planning process* that includes the following IICP standards:

- Identifies the applicant or member's physical and behavioral health support needs, strengths and preferences, and desired outcomes

- Takes into account the extent of, and need for, any family or other supports for the applicant or member, and neither duplicates nor compels natural supports
- Prevents the provision of unnecessary or inappropriate care
- Identifies the BPHC service activities the applicant or member needs and desires for participation
- Is guided by best practices and research on effective strategies for improved health and quality of life outcomes
- Reflects risk factors and measures in place to minimize them, including individualized backup plans and strategies when needed
- Is clear to the member and individuals who play an important role in supporting the member. The written plan must be in plain language and in a manner that is accessible to individuals with disabilities and persons with limited English proficiency

The following components must be documented on the IICP:

- Goals that promote stability and potential movement toward independence and continued integration into the community, treatment of physical and behavioral health symptoms, and areas of functional deficits related to the symptoms must be included
- Individuals or teams responsible for treatment, coordination of care, linkage and referrals to internal or external resources and care providers to meet identified needs should be documented
- The needs statement, goal, objectives and strategies must be focused on assisting the member in managing their health needs
- An explicit description of how BPHC care coordination will be utilized in meeting the individual's needs and goals

As part of the completed application, the state also requires documentation, signed by the applicant or member, which attests to the following:

- The applicant has been given choice of providers.
- The applicant has been given choice of services.
- The proposed IICP is individualized to meet the applicant's needs.
- The applicant has participated in the development of the IICP.
- A copy of the IICP that was submitted with the application was offered to the applicant and/or legal guardian.
- Program requirements, including financial requirements, have been reviewed with the applicant.
- The HCBS Residential Setting Screening Tool (RSST) has been completed with the applicant, a signed copy retained in the clinical record and the [\*HCBS Member Information Pamphlet\*](#) was provided to the applicant.

The IICP must be finalized and agreed to, with the informed consent of the applicant or member in writing and signed by all individuals and providers responsible for IICP implementation. A copy of the IICP must be distributed to the member and other people involved in the plan.

## Applicant's Refusal to Sign the IICP

The IICP must reflect the applicant/member's desires and choices for services and support. The applicant/member's signature, demonstrating member participation in the development of the IICP, is required. A signed copy of the IICP must be maintained in the clinical record and an attestation must be included on the electronic application submitted through the DARMHA. If an applicant/member requests

services but refuses to sign the IICP for various reasons (such as thought disorder, paranoia and so on), the provider staff is required to document on the IICP that the member agreed to the IICP but refused to sign the plan. The provider staff must also document in the clinical record that a planning meeting with the member did occur and that the IICP reflects the member's choice of services and agreement to participate in the services identified in the IICP. The documentation must further explain any known reasons why the applicant/member refused to sign the IICP and how that will be addressed in the future.

## Ongoing IICP Review

The provider agency is responsible for ensuring that a member's progress and movement toward attaining the IICP goals is monitored on a regular basis. The provider staff must meet either face-to-face or via telehealth with the member for a minimum of three instances of the BPHC service to each eligible member every 180 days and document the services in progress notes. The documentation should include an assessment of the member's response to service delivery and determine if the member continues to benefit from the BPHC service, and that the IICP continues to meet the member's identified needs, goals and preferences. Members must be provided with a method to request updates to the IICP, as needed. One of the three-member service events can be the re-application for potential ongoing BPHC.

Typically, the BPHC service authorization expires within 180 days of the effective authorization date for the BPHC service. However, because the BPHC end date is made to align with the member's Medicaid Rehabilitation Option (MRO) end date, the BPHC service authorization may end sooner than 180 days. The provider agency is responsible for monitoring the expiration of the BPHC service authorization to ensure the timely submission of a renewal application for continued approval of the BPHC service past the effective date of the member's BPHC authorization granted by the DMHA. See [Section 12: BPHC Eligibility Period and Renewal of Eligibility](#) for information pertaining to the renewal of authorization and BPHC eligibility process.



## Section 10: SET Determination of BPHC Service Eligibility – Initial BPHC Application

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Under the direction of the Indiana Family and Social Services Administration (FSSA) Division of Mental Health and Addiction (DMHA) and the supervision of the FSSA Office of Medicaid Policy and Planning (OMPP), the State Evaluation Team (SET) is responsible for the determination of Behavioral and Primary Healthcare Coordination (BPHC) *clinical eligibility* and authorization for BPHC service utilization. At initial BPHC application, if the individual is deemed clinically eligible, information is sent to the FSSA Division of Family Resources (DFR), which determines the applicant's BPHC nonclinical eligibility such as income, age, citizenship and state residency. Applicants must meet both the clinical and nonclinical eligibility criteria to be deemed eligible for the BPHC service.

This section describes the eligibility determination processes for an applicant applying for enrollment for BPHC. See [Section 12: BPHC Eligibility Period and Renewal of Eligibility](#) for information on the renewal process.

### BPHC Clinical Eligibility Review Process

The BPHC provider agency electronically submits the BPHC application packet to the DMHA SET through the Data Assessment Registry Mental Health and Addiction (DARMHA) system for the state's independent review and assessment of the applicant's clinical eligibility for the BPHC service. Upon receipt of the application, the SET engages in the following activities to determine if the applicant meets *clinical eligibility*:

1. Review the BPHC member application packet for completeness. The following information is required for a complete BPHC application submission via the DARMHA. (See [Section 6: Member Application for BPHC](#) for additional information about each of these application fields.) These fields are:
  - a. Applicant Information
  - b. Home- and Community-Based Services (HCBS) Waiver
  - c. HCBS setting designation of current living environment
  - d. Symptoms of BPHC-eligible Primary Behavioral Health Diagnosis
  - e. Physical Health Issue(s)
  - f. BPHC Service Activities (during the current eligibility period and benefit to consumer; used for provider renewal application only)
  - g. Contact Person (at the community mental health center [CMHC] and the applicant's legal guardian, if applicable)
  - h. Justification of Need for Program
  - i. BPHC Individualized Integrated Care Plan (IICP) (includes goals, objectives and strategies)
  - j. Health Questions
  - k. BPHC Attestations

<p><i>Note: If the DMHA SET pends an application and it is not resubmitted within seven calendar days from the date it was pended, the application can be denied.</i></p>
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2. Verify that the applicant meets all target-group and needs-based BPHC eligibility criteria (see [Section 5: BPHC Member Eligibility Criteria](#) for additional information regarding eligibility criteria).

3. Review the proposed IICP to ensure that the plan meets the following criteria and supports the need for BPHC:
  - a. Goals and objectives are linked to the applicant’s identified physical needs for the BPHC service.
  - b. Strategies support the goals, objectives and needs.
  - c. Evidence is provided that the applicant is able to benefit from the BPHC service.
  - d. Evidence is provided that the IICP submitted is individualized and driven by the applicant’s needs and preferences.
  - e. The needs statement section in the IICP supports use of the BPHC service to assist the member in the management and coordination of behavioral and physical healthcare services.
4. Following review of the application packet and making an evaluation of the member’s need for the BPHC service, render one of the following BPHC clinical eligibility determinations:
  - a. *Clinical Eligibility Approved:* If the individual is found clinically eligible, the SET sends the applicant’s information to the DFR for review and determination of the applicant meeting BPHC Medicaid financial and other nonclinical Medicaid eligibility criteria. (For additional information, see the following subsections, [Financial and Nonclinical Eligibility Determination](#) and [Authorization of the BPHC Service](#).)
  - b. *Clinical Eligibility Denied:* If the applicant is not clinically eligible for BPHC, the DMHA SET notifies the provider and applicant of the clinical denial determination. (See the [Denial of BPHC Clinical Eligibility](#) subsection for additional information.)
  - c. *Clinical Eligibility Pended:* All required fields must be filled out on the BPHC application, or it will be denied. If review of the BPHC application determines that the needs-based criteria are met, the applicant lives in a home- and community-based setting, and the IICP contains all the required information supporting the need for the BPHC service, but the “Justification for Need of Program,” “Consumer’s Current Situation,” and/or “BPHC Service Activities During the Previous Eligibility Period and Benefit to Consumer” sections of the application lack support, the SET pends the application and requests additional information. The BPHC provider agency shall then review the pended application and the comments provided by the SET in the “Comments” section to correct the application, if appropriate, and resubmit it for final review and eligibility determination. After it is in pending status, the application cannot be put into draft; it must be submitted, or the information will be lost. If the SET pends an application and it is not resubmitted within seven calendar days from the date it was pended, the application will be denied.

*Note: The SET may take up 10 calendar days to make a determination on clinical eligibility.*

## Financial and Nonclinical Eligibility Determination

If an applicant is found *clinically eligible* for the BPHC service, the DMHA forwards the clinical approval information to the DFR. If the applicant is already Indiana Health Coverage Programs (IHCP)-eligible when determined clinically eligible by the SET, the DFR updates the member’s existing case.

If the applicant is not IHCP-eligible at the time of BPHC application, as described in further detail in [Section 6: Member Application for BPHC](#), an application to the IHCP is also required. The DFR reviews financial and nonclinical eligibility, such as citizenship and state residency.

1. If the applicant meets the BPHC financial (that is, up to 300% of the federal poverty level [FPL] for individuals who are aged, blind or disabled) and nonclinical criteria for IHCP eligibility, the DFR completes the following:
  - a. Notifies the DMHA and the Core Medicaid Management Information System (*CoreMMIS*), the state’s Medicaid Management Information System, that the applicant meets Medicaid eligibility criteria (see the following [Authorization of the BPHC Service](#) subsection for additional information)

*Note: Income criteria: To be eligible for BPHC, an individual who is aged, blind or disabled must have income at or below 300% of the FPL. The DFR makes the final financial eligibility determination.*

- b. Sends eligibility notice to the applicant, notifying them that they are eligible for IHCP coverage
- 2. If the applicant does not meet criteria for IHCP eligibility, the DFR completes the following:
  - a. The DFR notifies the DMHA that the applicant is not IHCP-eligible (see the [Denial of BPHC Eligibility](#) subsection for additional information.)
  - b. The DFR sends an IHCP denial notice to the applicant (providers can verify an individual's IHCP eligibility status through normal IHCP eligibility verification methods, as detailed in [Member Eligibility and Benefit Coverage](#) provider reference module located at [in.gov/medicaid/providers](http://in.gov/medicaid/providers).)

*Note: The DFR has up to 90 days to make a determination of IHCP eligibility on the basis of disability.*

## Authorization of the BPHC Service

Final eligibility for the BPHC service is based on the applicant meeting clinical, nonclinical (for example, residency and citizenship) and financial criteria. After the DMHA receives notice from the DFR that an individual is eligible and enrolled in the IHCP, the following occurs, enabling the applicant to begin utilizing the BPHC service:

- 1. The SET transmits the BPHC service approval to the IHCP.
- 2. This approval is entered into the IHCP Provider Healthcare Portal (IHCP Portal), and a BPHC approval notice is sent to the applicant and their provider. The authorization notification generated includes the following information:
  - a. Start and end dates for BPHC eligibility (see [Section 11: BPHC and IHCP Services Eligibility and Authorization](#) for additional information)
  - b. BPHC procedure code, modifiers and number of units approved

## Denial of BPHC Eligibility

An applicant may be determined ineligible for BPHC due to not meeting clinical criteria (as determined by the SET) or financial and other nonclinical criteria (as determined by the DFR). If the applicant is determined ineligible (denied the BPHC service), the following occurs:

- 1. If an applicant is determined *clinically* ineligible for BPHC by the DMHA SET, the DMHA sends a denial notification with appeal rights to the applicant and provider, informing them that their application for the BPHC service has been denied. If applicable, the BPHC provider agency shall notify the applicant's authorized representative of the denial if the authorized representative is listed in the contacts section of the application. The notice includes the reason for denial and information about appeal rights and how to appeal the determination.
- 2. Individuals applying to BPHC who are found ineligible for the IHCP for reasons other than a clinical denial (for example, their income exceeds 300% of the FPL, they do not meet state residency requirements, and so on) receive an IHCP eligibility denial or discontinuance notice from the DFR. This notice includes information about appeal rights and how to file an appeal for the denial determination.

## BPHC Eligibility and Authorization Effective Dates

Information regarding the BPHC eligibility determination and approval for utilization of the BPHC service may be accessed by providers on the [IHCP Provider Healthcare Portal](https://in.gov/medicaid/providers), accessible from the homepage at [in.gov/medicaid/providers](https://in.gov/medicaid/providers).

BPHC service delivery may not begin until an individual has Medicaid eligibility determined and clinical eligibility is approved by the SET. BPHC provider agencies do not receive reimbursement for providing BPHC service before SET and DFR approval, or for delivery of the service outside the BPHC eligibility period documented on the authorization notification.

The BPHC service package assignment effective date is based on the following rules:

- The earliest effective date for BPHC eligibility is the program effective date of June 1, 2014.
- The BPHC effective date is never earlier than the date the SET determined clinical criteria was met.
- The BPHC effective date can be any day of the month.
- If an individual does not meet the IHCP nonclinical or BPHC Medicaid financial criteria as of the date, the SET determines clinical criteria was met (for example, the applicant's income exceeds 300% of the FPL, the applicant is not a resident of Indiana, and so on), and the BPHC effective date is the date the DFR determines the member met BPHC nonclinical and financial criteria. This date is never earlier than the date the SET determined clinical criteria was met (see [Section 6: Member Application for BPHC](#) for additional information).

## Applicant's Discharge Before BPHC Eligibility Determination

If an application needs to be withdrawn or discharged before the DMHA SET makes a clinical determination, the BPHC provider shall notify DARMHA via secure email to [darmha@fssa.in.gov](mailto:darmha@fssa.in.gov). This directive applies in cases when the applicant moved out of Indiana, died before completing the clinical eligibility determination, and so on. This email must include the following:

- Applicant's name
- IICP number
- The reason the application should be discharged (for example, indication that the applicant has died)
- Date

## Section 11: BPHC and IHCP Services Eligibility and Authorization

The Behavioral and Primary Healthcare Coordination (BPHC) member is eligible to receive all medically necessary Medicaid services – for example, Medicaid outpatient mental health services, Medicaid Rehabilitation Option (MRO) and/or Adult Mental Health Habilitation (AMHH) services – for which the member qualifies. This section provides basic information regarding authorization for Medicaid behavioral health services that supplement the BPHC service. For members who are not otherwise Medicaid-eligible – either through Healthy Indiana Plan (HIP), Hoosier Care Connect, Hoosier Healthwise, Indiana PathWays for Aging (PathWays) or Traditional Medicaid (Indiana Health Coverage Programs [IHCP]) – the BPHC service eligibility and service authorization must be obtained for the BPHC member to access and use other Medicaid services. For these members, a lapse in BPHC eligibility may result in the loss of coverage.

### BPHC and MRO Service Authorization

The following applies for members using MRO in conjunction with the BPHC service:

- For members who have an active MRO service package assignment at the time of BPHC application, BPHC eligibility end date is aligned with the current MRO end date; so, moving forward, the two application processes will be aligned. The number of BPHC units authorized is prorated based on the time left until the MRO service package expires, as outlined in the following table.

Table 3 – BPHC Units Authorized with Active MRO Service Package

# Months Until MRO Expires	# Units of BPHC Authorized
Six	48
Five	40
Four	32
Three	24
Two	16
One	8

- For example, if a member is determined eligible for BPHC as of Sept. 1, 2022, and the MRO service package expiration date is Oct. 12, 2022, 16 BPHC units would be approved, and the BPHC expiration date will be Oct. 12, 2022.
- When BPHC and MRO service package authorizations are aligned following the initial application and authorization process described previously, the BPHC service is approved for 48 units. The MRO Case Management Services (billing code T1016 HW) is authorized at 48 fewer units of service than would be authorized if the member was not utilizing the BPHC service. See [Section 12: BPHC Eligibility Period and Renewal of Eligibility](#) for additional information on the BPHC renewal process.
- For members who are not IHCP-eligible at the time of BPHC application and therefore do not have an active MRO service package assignment, the MRO service package is aligned with the BPHC effective and end dates (see [Section 10: SET Determination of BPHC Service Eligibility –Initial BPHC Application](#) for further information on how the BPHC effective date is set). Forty-eight units of BPHC are authorized, and the MRO service package is assigned based on the member's level of need (LON), as outlined in the [Medicaid Rehabilitation Option Services](#) provider reference module

at [in.gov/medicaid/providers](https://in.gov/medicaid/providers), with the exception that the number of authorized MRO case management units (T1016 HW) are reduced by 48 units, as outlined in the following table.

**Table 4 – MRO Case Management Units Authorized with Active BPHC**

<b>MRO Service Package</b>	<b># Authorized MRO CM Units</b>
3	152
4	252
5	352
5A	452

## **BPHC and AMHH Service Authorization**

The following applies for members using AMHH in conjunction with BPHC:

- For members who have active AMHH service package assignments at the time of BPHC application, the number of BPHC units is authorized based on the time left until the AMHH evaluation is due, as outlined in the following table. If the AMHH end date is in less than 180 days, the BPHC end date is aligned with the AMHH end date. If the AMHH end date is more than 180 days away, the BPHC service is authorized for a 180-day period. In both scenarios, the active AMHH authorization period remains unchanged.

**Table 5 – BPHC Units Authorized with Active AMHH**

<b># Months Until AMHH Expires</b>	<b># Units of BPHC Authorized</b>
Six-Twelve	48
Five	40
Four	32
Three	24
Two	16
One	8

- If a member applies for AMHH after they already have an active BPHC service package assignment, the number of authorized AMHH Care Coordination units (billing code T1016 UB) is reduced to account for the BPHC service package assignment. The AMHH approval end date is aligned with the existing BPHC approval period.

## **Lapses in IHCP Coverage – Impact on Service Authorization**

In accordance with federal regulations, IHCP eligibility must be reviewed at least every 12 months through the Indiana Family and Social Services Administration (FSSA) Division of Family Resources (DFR). The IHCP eligibility redetermination process is established by the DFR and is not on the same schedule as BPHC renewals. Because a member must be IHCP-eligible to be BPHC-eligible, if the member loses IHCP eligibility, the BPHC service is not reimbursed during the lapse in IHCP eligibility. However, as long as MRO or AMHH and BPHC clinical eligibility is retained, the BPHC, AMHH and MRO packages remain in place. Therefore, if the member reestablishes IHCP eligibility, and the BPHC/MRO or BPHC/AMHH

service authorization hasn't lapsed, the member may restart services without having to reapply for AMHH or BPHC service authorization. However, if the BPHC, AMHH or MRO authorization or service package has lapsed, a new BPHC application is required to assess eligibility for the BPHC service.





## Section 12: BPHC Eligibility Period and Renewal of Eligibility

A member who is approved to receive Behavioral and Primary Healthcare Coordination (BPHC) is eligible for service for up to 180 days from the date of service approval and authorization. As described in further detail in [Section 11: BPHC and IHCP Services Eligibility and Authorization](#), when a member has an active Medicaid Rehabilitation Option (MRO) service package assignment at the time of BPHC authorization, the MRO and BPHC clinical eligibility expiration dates are aligned so the BPHC renewal occurs at the same time as the MRO service package expiration date. In all other cases, BPHC must be renewed every 180 days. To prevent a gap in coverage, the provider agency is responsible for tracking the end date of the BPHC service and submitting a BPHC eligibility renewal application.

### BPHC Renewal Process

*Note: The care coordinator, the Indiana Family and Social Services Administration (FSSA) Division of Mental Health and Addiction (DMHA)-approved BPHC provider overseeing the member's BPHC service delivery, is responsible for assisting the member in tracking authorization end dates and facilitating initiation of the renewal process.*

The provider agency is responsible for tracking the end date of BPHC and submitting a renewal application, including an updated proposed Individualized Integrated Care Plan (IICP) and Adult Needs and Strengths Assessment (ANSA) at least 30 calendar days (but no more than 60 calendar days) before the end of the BPHC service period. A report is available in the Data Assessment Registry Mental Health and Addiction (DARMHA) to assist providers in tracking the BPHC end date (see [Appendix E](#)). Service package end dates for MRO and BPHC are aligned (when applicable) so that renewals occur at the same time for both programs. To prevent a potential gap in eligibility for Indiana Health Coverage Programs (IHCP), BPHC applications must be submitted in DARMHA at least 30 calendar days (but no more than 60 calendar days) before the BPHC eligibility end date.

A BPHC reevaluation follows the same eligibility determination processes as the initial BPHC application, as described in previous sections. Failure to submit the BPHC renewal application within the designated time frame and before the end date of the BPHC eligibility period may result in a lapse of authorization for the member, including loss of IHCP eligibility for members who are only IHCP-eligible because of BPHC eligibility. If IHCP eligibility is not reestablished, the lapse in authorization results in a denial of reimbursement for any BPHC service provided during the lapse in authorization. The following BPHC renewal process applies for all BPHC members:

1. The BPHC renewal application must be submitted into DARMHA at least 30 calendar days (but no more than 60 calendar days) before the BPHC clinical eligibility end date to ensure adequate time for processing the application. Failure to submit a BPHC renewal application at least 30 calendar days in advance may result in a gap in coverage. Submission of the BPHC renewal packet requires the following:
  - a. Conducting a face-to-face or telehealth (according to Indiana Administrative Code) holistic clinical and biopsychosocial evaluation completed by a DMHA-approved BPHC service provider
  - b. Administration of the ANSA within 60 days of the BPHC application submission to determine whether the member meets the level of need (LON) for intensive community-based services, as demonstrated by a rating level of three or higher
  - c. Assessment of the member's progress toward meeting treatment goals on the BPHC IICP. A review of how the member has benefited from the BPHC service and the BPHC service activities used during the current eligibility period are components of the clinical renewal

- determination. The assessment must be summarized appropriately in the designated field on the renewal application.
- d. Confirming, via any submitted documentation, that the member continues to meet BPHC target-group and needs-based eligibility criteria
  - e. Completing an updated BPHC application, including all attestations with signatures maintained in the clinical record
  - f. Completing an updated IICP documenting the member's choice of BPHC service providers
2. The State Evaluation Team (SET) reviews and assesses the application and the member's response and needs based on the clinical reevaluation information submitted to determine whether the member continues to meet BPHC eligibility criteria and needs-based eligibility criteria.
  3. If determined clinically eligible for BPHC during the renewal process, the applicant and the referring provider agency receive a service authorization notice. The provider agency is responsible for notifying the member's legal guardian or authorized representative (if applicable).
  4. If the member is determined by the SET to no longer be clinically eligible for BPHC, the member and provider receive a denial notification with appeal rights from the DMHA (including the member's appeal rights). The DMHA notifies the Division of Family Resources (DFR) of the change in BPHC clinical eligibility. The DFR determines if the consumer is eligible for an alternate IHCP eligibility category. If the loss of BPHC clinical eligibility results in loss of IHCP eligibility (that is, the member was only IHCP-eligible due to meeting the BPHC needs-based and targeting criteria, and the BPHC income eligibility of under 300% of the federal poverty level, or FPL), the DFR sends a discontinuance notice with appeal rights to the member and authorized representative.

**All BPHC renewals are handled as addressed in this section, with the exception of BPHC applications approved within 60 days of the MRO end date.**

When a BPHC applicant has an active MRO service package assignment, the BPHC end date is aligned with the MRO end date. The DMHA SET reviews and facilitates a renewal determination of BPHC eligibility based on the original application, without the need for a community mental health center (CMHC) to submit a new application.

*Note: Though no one is prohibited from applying for BPHC, members who are already IHCP-eligible and receiving MRO do not receive additional benefits by applying for BPHC. Therefore, the need for a BPHC application should be carefully evaluated in this situation.*

## Administrative Renewals

When an initial BPHC application is submitted for a member that has an MRO service package expiring within 60 days of the start date of the initial BPHC package, the CMHC is not required to submit a renewal application. The DMHA SET reviews and facilitates a renewal determination ("Administrative Renewal") of BPHC eligibility based on the original application without the need for a CMHC to submit a new application. BPHC and MRO have the same end date going forward for each six-month eligibility period. A BPHC renewal application must be submitted at least 30 days (but no more than 60 days) before the end date of BPHC and MRO going forward.

## Prior Authorization

Prior authorization (PA) is available for BPHC. BPHC service packages are assigned for 180 days. Within the last 60 days of an assigned service package, a provider may reassess the person and a new service package will be assigned to start the day after the existing package ends. For the majority of members receiving BPHC, the assigned BPHC service package provides sufficient units of service to meet their needs. However, for members that require additional units of Care Coordination assigned in the service

package, a PA request is required. Continually monitor the member's service units to determine if additional BPHC service units are needed. The provider must update the IICP and submit a PA request in DARMHA for review by a member of the State Evaluation Team. For PA requests, select **Modified IICP**.

Requests must include the following information:

- Member Name
- Member DARMHA, Internal and IICP ID numbers
- Units remaining in package
- Units being requested
- A description of the activities that led to the exhaustion of BPHC units
- A description of how the requested additional units will be used to support the member's needs and support fulfillment of the IICP over the remainder of the package period

A member of the DMHA SET will review requests and either approve for the units requested, approve for an altered number of units or deny. Upon SET decision, the completed tool will be returned to for agency documentation. PA decisions are at the discretion of the SET and are final.

## A Loss or Interruption of BPHC Service

When there is an interruption in BPHC service delivery due to the member leaving the community and entering an institutional setting (for example, incarceration, hospitalization, state-operated facility [SOF] and so on), the BPHC service may not be billed during the period of service interruption. The BPHC eligibility and authorized service units remain available to the member, within the originally authorized BPHC eligibility period, for access when the member returns to the community. However, if the member does not return to the community during the BPHC eligibility period, the member must reapply for BPHC service, via a new BPHC application, before or at reintegration into the community, with the assistance of a BPHC service provider agency. If there is a loss of IHCP eligibility, a new *Indiana Application for Health Coverage (IAHC)* must also be submitted, as described in the [Application to BPHC Prior to Medicaid Eligibility Determination](#) subsection in *Section 6*.

## Termination of BPHC

If the BPHC service needs to be terminated before the end of the BPHC eligibility period (for example, a member requests to terminate the service), the provider agency must assist in linking the member to services or programs that may be able to meet the individual's needs. The provider agency must document in the clinical record the efforts made to coordinate transition to other services or benefits. If a provider is no longer serving a consumer, the provider agency must follow the required practice of closing the DARMHA episode. In addition, it is the provider's responsibility to complete a discharge ANSA if required. For example, if a client dies or drops out of treatment, a discharge ANSA is not required. However, the service episode must be closed in DARMHA.



## Section 13: Clinical and Administrative Documentation

The Behavioral and Primary Healthcare Coordination (BPHC) provider agency must comply with all clinical documentation requirements as defined by the Indiana Family and Social Services Administration (FSSA) Division of Mental Health and Addiction (DMHA) or Office of Medicaid Policy and Planning (OMPP) as well as the Centers for Medicare & Medicaid Services (CMS). To be reimbursable, the BPHC service and program eligibility must be supported by documentation that is maintained in the member's clinical record.

The documentation required to support billing for BPHC service activities must meet the following standards:

- Reflect progress toward the goals documented in the member's Individualized Integrated Care Plan (IICP)
- Be updated with every member encounter when billing is submitted for reimbursement
- Be written and signed by the provider staff rendering services

The documentation to support billing for the BPHC service must:

- Focus on recovery and habilitation and/or rehabilitation
- Support coordination and/or management of identified health needs and services
- Emphasize consumer strengths

### General Documentation Requirements

*Note: A provider must maintain documentation for services provided to a BPHC service member in accordance with the requirements under Indiana Administrative Code 405 IAC 5-21.8-6.*

Providers are responsible for understanding and adhering to the requirements and limitations for the BPHC activities the providers are qualified to provide. Questions about a BPHC activity and its requirements may be directed to the State Evaluation Team (SET). This team is responsible for completing BPHC quality assurance (QA) activities in support of CMS requirements for the delivery of the BPHC service. The following applies to each BPHC service activity that is billed for reimbursement:

- All BPHC service and eligibility documentation is subject to review by the CMS and the state or its designees.
- The provider is subject to denial of payment or recoupment for paid claims for services if the provider does not have adequate documentation to support the BPHC service activity billed.
- Clinical documentation of service activities under this section, including face-to-face and telehealth service activities and services on behalf of the member, must contain the following information:
  - Date of service rendered, including month, day and year
  - Start and end time of the service
  - Actual time spent rendering the service (*Note: The content of the documentation must support the amount of time billed. See [Section 18: BPHC Service Billing](#), for additional information about calculating time spent providing BPHC service.*)
  - Location or setting where the service activity was provided

- Member's IICP goal being addressed during the session with a focus on physical and behavioral health management
- Type of service activity being provided
- Focus of the session or service activity delivered to or on behalf of the member
- Strengths of client
- Member's symptoms, needs, goals or issues addressed during the session
- Progress made toward meeting goals noted on the IICP with a focus on health management
- Names and qualifications of the staff providing the service (*Note: BPHC progress notes MUST include the staff qualifications such as: Qualified Behavioral Health Professional [QBHP] or Other Behavioral Health Practitioner [OBHP].*)
- Additional documentation is required for each service activity provided on behalf of a member that is not present. This documentation includes:
  - Names of all persons attending the session and each person's relationship to the member
  - How the service benefits the member and assists the member in reaching the IICP goals
- Services must be provided by an individual who has been trained in BPHC prior to delivering the service and has a minimum of two years of relevant experience.

## BPHC Member Home- and Community-Based Settings Requirements

BPHC is a Home- and Community-Based Services (HCBS) program. In accordance with federal regulations for 1915(i) State Plan HCBS programs, service activities are to be provided within the individual's home (place of residence) or at other locations based in the community. Service activities cannot not be provided in an institutional setting.

In January 2014, the CMS published regulations to better define the settings in which states can provide Medicaid HCBS. The HCBS settings final rule became effective March 17, 2014. The HCBS settings final rule, along with additional guidance and fact sheets, is available on the [CMS Home and Community Based Services](https://www.medicare.gov/medicaid-waivers/hcbs) website at [medicaid.gov](https://www.medicare.gov).

Members who receive Adult Mental Health Habilitation (AMHH) and/or BPHC are categorized as living in one of four types of settings: provider owned, controlled or operated (POCO) settings, non-POCO settings, non-community mental health center (non-CMHC) POCO residential settings and private/independent homes.

*POCO residential settings*, as defined by the CMS, are those settings in which an individual resides that are specific physical places that are owned, co-owned and/or operated by a provider of HCBS. DMHA recognizes any residence in which an individual lives that is owned by a paid caregiver who is not a family member must be treated as a provider owned and controlled setting. DMHA's Adult 1915(i) programs compliance focus is on both the 24 DMHA-certified CMHCs, who are the exclusive providers of AMHH and BPHC in Indiana [per 1915(b)(4) waiver] and the settings that provide HCBS waiver services through the OMPP and the Division of Disability and Rehabilitative Services (DDRS). The DMHA regularly coordinates with sister divisions that have authority over non-CMHC providers of HCBS (including DMHA Youth Services, Division of Aging and DDRS) to ensure that the residential setting of each individual receiving HCBS is or becomes compliant with the federal HCBS settings final rule.

Four types of DMHA-certified residential facilities for adults were identified: alternative family homes for adults (AFA), transitional residential living facility (TRS), semi-independent living facilities (SILP) and supervised group living (SGL). Each of these DMHA-certified residential facilities meets the definition of a POCO residential setting. However, the designation as a POCO residential setting is not limited to only DMHA-certified residential facilities. AMHH/BPHC providers in Indiana can own, control or operate other types of residential settings.

*Non-POCO residential settings* are owned, controlled and/or operated by a provider that does not provide HCBS services. Examples of non-POCO residential settings include but not limited to unlicensed assisted living facilities, room and board facilities and sober living environments (SLEs). DMHA requires the DMHA-certified CMHC provider to work with the setting operating authority to complete the non-POCO HCBS compliance setting assessment and evaluate for institutional qualities.

*Non-CMHC POCO residential settings* provide HCBS waiver services through the OMPP and/or DDRS. Therefore, these settings are considered provider owned, controlled and/or operated but not by a DMHA-approved CMHC. Settings under the authority of the OMPP and/or DDRS work with those divisions to complete any necessary remediation to become HCBS compliant.

*Private/Independent Homes* are those for which there is no financial relationship between the provider agency and the property owner. These include private homes owned/leased by the member or the member's family or friends, as well as apartments, condominiums, multi-family/multi-resident homes (duplexes and boarding homes, for example), manufactured homes and other types of congregated residences leased by the member or the member's family or friends from a property owner. Per the CMS, private/independent homes are under the assumption they meet the HCBS requirements, but providers are still required to assess for compliance using the Residential Setting Screening Tool (RSST) process.

*Non-residential settings:* While some AMHH and BPHC services may be delivered in the member's home/place of residence, others are provided at various locations throughout the community. These community locations may include non-institutional, non-residential public settings (restaurants, libraries, service centers, stores and so on) that are available to everyone in the community and are therefore compliant with the HCBS settings final rule. Some of the activities permitted under AMHH and BPHC may be delivered in a provider-operated, nonresidential community setting, typically an outpatient community-based clinic operated by the provider agency.

Any modifications of the additional conditions for provider-owned and controlled residential settings must be supported by a specific assessed need and justified in the person-centered service plan. The following requirements must be documented in the modified person-centered service plan:

- Identify a specific and individualized need.
- Document the positive interventions and supports used prior to any modifications to the person-centered plan.
- Document less intrusive methods of meeting the need that have been tried but did not work.
- Include a clear description of the condition that is directly proportionate to the specific need addressed.
- Include regular collection and review of data to measure the ongoing effectiveness of the modification.
- Include established time limits for periodic reviews to determine if the modification is still necessary or can be terminated.
- Include the informed consent of the individual.
- Include an assurance that interventions and supports will cause no harm to the individual.

A copy of the modified IICP and each generation of modified IICPs will be provided to the DMHA SET to ensure adherence to HCBS person-centered service plan standards.





## Section 14: Behavioral and Primary Healthcare Coordination Service

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Behavioral and Primary Healthcare Coordination (BPHC) consists of one service that comprises a variety of reimbursable activities intended to assist in the coordination of mental health and primary healthcare services to manage the healthcare needs of the BPHC member. Service activities include logistical support, advocacy and education to assist individuals in navigating the healthcare system, and activities that help members gain access to needed mental health and physical health services and manage their health conditions. This service includes the following:

- Coordination of healthcare services, which may include:
  - Direct assistance in gaining access to services
  - Coordination of care within and across systems
  - Oversight of the entire case
  - Linkage to services
- Assistance in using the healthcare system, which may include:
  - Logistical support
  - Advocacy
  - Education
  - Referral and linkage to medical providers
- Coordination of services across systems, which may include:
  - Physician consults, defined as facilitating linkage and communication between medical providers
  - Serving as a communication conduit
  - Notification of changes in medication regimens and health status
  - Guiding for more effective communication with providers

### Service Delivery

The following activities may be provided under the BPHC service:

- *Needs Assessment:* A needs assessment consists of identifying the member's needs for coordination of health services, including reassessments. Specific assessment activities necessary for a complete needs assessment of the member may include:
  - Gathering information about the member's history
  - Identifying the member's needs
  - Completing related documentation
  - Gathering information from other sources, such as:
    - Family members, natural supports and/or legal guardian (if applicable)
    - Medical providers
- *IICP Development:* These activities include the development of a written Individualized Integrated Care Plan (IICP), based on the information collected through the needs assessment phase. The IICP shall include member-driven goals for healthcare or lifestyle changes and identify the health activities and assistance needed to accomplish the member's objectives. IICPs may include activities and goals such as:
  - Referrals to medical services
  - Education on health conditions

- Activities to ensure compliance with health regimens and healthcare provider recommendations
- Activities or contacts necessary to ensure that the IICP is effectively implemented and adequately addresses the health needs of the individual
- *Referral and Linkage:* This activity includes helping link the member with medical providers and other programs and services that are capable of providing needed health services
- *Coordination of Healthcare Services:* These activities provide coordination of health services across systems, including but not limited to:
  - Physician consults, defined as facilitating linkage and communication between medical providers
  - Provider serving as a communication conduit between the member and specialty medical and behavioral health providers
  - Notification, with the member's permission, of changes in medication regimens and health status
  - Guiding to assist the member in interacting more effectively with behavioral and primary healthcare providers
- *Monitoring and Follow-up:* These activities include face-to-face or telehealth contact with the member at least three times during a 180-day eligibility period, including:
  - Contacts and activities necessary to ensure that the IICP is effectively implemented and adequately addresses the needs of the member
  - Activities and contacts with the following individuals:
    - The member
    - Family members or others who have a significant relationship with the member
    - Nonprofessional caregivers
    - Providers
    - Other entities
- *Evaluation:* These activities include periodic reevaluation of the member's progress for the following reasons:
  - To ensure that the IICP is effectively implemented and adequately addresses the member's needs
  - To determine if the services are consistent with the IICP and if any changes to the IICP are required
  - To make changes or adjustments to the IICP to meet the member's ongoing needs
  - To evaluate or reevaluate the member's progress toward achieving the IICP's objectives

## Program Standards

All BPHC service activities provided to a member must meet the following requirements:

- Be supported by the member's level of need (LON)
- Be documented in the member's plan of care, in accordance with the requirements under *Indiana Administrative Code 405 IAC 1.1-1-1*

Provider reimbursement for the BPHC service is subject to, but not limited to, the following:

- The member's eligibility for the service
- The provider staff's qualifications and certification
- The scope, limitations and exclusions of the service activity

## Billing for Clinical Supervision of BPHC Service Activities

The time devoted to formal supervision between the BPHC provider staff and the licensed supervisor to review the member's care and treatment shall:

- Be an included BPHC activity
- Be documented accordingly in the member's clinical record
- Be billed under only one provider staff

## Exclusions

The following activities are not reimbursable as BPHC service:

- Activities billed under Behavioral Health Level of Need (LON) Redetermination
- Activities billed under Medicaid Rehabilitation Option (MRO) Case Management
- Activities billed under Adult Mental Health Habilitation (AMHH) Care Coordination
- An activity provided as a diversion, leisure or recreational activity
- The actual or direct provision of medical services or treatment, including but not limited to medical screening, such as blood pressure screenings or weight checks
- Activities billed under medication training and support
- Individual, group or family therapy services
- Activities billed under crisis intervention services
- Services provided to the member at the same time as another service that is the same in nature and scope, regardless of funding and provider source. This includes, but is not limited to, Home- and Community-Based Services (HCBS) waivers, as described in the [1915\(c\) Home- and Community-Based Services \(HCBS\) Waivers](#) section
- Services provided while the member is in an institutional or non-community-based setting
- Services provided in a manner that is not within the scope or limitations of a BPHC service activity
- Service activities not documented as covered or approved on the member's Indiana Family and Social Services Administration (FSSA) Division of Mental Health and Addiction (DMHA)-approved IICP
- Service activities not supported by documentation in the member's clinical record
- Service provided exceeding the defined limits of the service, including service quantity, limits, duration or frequency
- Activities excluded from the service scope or definition

## BPHC HCPCS Codes

The following table outlines the Healthcare Common Procedure Coding System (HCPCS) codes for BPHC. Tier 1 providers include licensed professionals, qualified behavioral health professionals (QBHPs) and other behavioral health professionals (OBHPs). Tier 2 providers include DMHA Certified Peer Support Professionals (CPSPs).

Table 6 – HCPCS Codes for Behavioral and Primary Healthcare Service

Code	Modifiers	Code Description
<b>T1016</b>	<b>UC – Case Management for BPHC</b>	Case management, each 15 minutes; Behavioral and Primary Healthcare Coordination, each 15 minutes  BPHC- Tier 1: 1 Unit = 15 minutes  \$14.53 per 15 minute unit  Limited to 48 units (12 hours) per six months total units in combination with T1016 UC U3
<b>T1016</b>	<b>UC U3 – Case Management for BPHC</b>	Case management, each 15 minutes; Behavioral and Primary Healthcare Coordination, each 15 minutes; Certified Peer Support Professional  BPHC- Tier 2: 1 Unit = per 15 minutes  \$8.55 per 15 minute unit  Limited to 48 units (12 hours) per six months in combination with T1016 UC

## Limitations

The BPHC service is limited to a maximum of 12 hours, or 48 units, per six months.

## 1915(c) Home- and Community-Based Services (HCBS) Waivers

A BPHC consumer may receive 1915(c) waiver services. However, a federally approved HCBS benefit requires that services not duplicate other Medicaid funded services that are already available. Service duplication would most likely occur in the following five service areas, which are available through the following HCBS benefit programs or other Medicaid funded programs:

- Community Integration and Habilitation (CIH) Waiver:
  - Case management
  - Wellness coordination
- Family Supports Waiver (FSW):
  - Case management
- Health and Wellness (H&W) Waiver:
  - Healthcare coordination
  - Care management
- Indiana PathWays for Aging (PathWays) Waiver:
  - Healthcare coordination
  - Waiver service coordination
- Traumatic Brain Injury (TBI) Waiver:
  - Healthcare coordination
  - Care management

- Managed care providers:
  - Healthcare coordination

BPHC care coordinators must ensure that person-centered planning and all activities, regardless of funding sources, are included in the member's IICP. When a member has an HCBS waiver, the HCBS waiver case managers and BPHC care coordinator are responsible for monitoring services to prevent duplication. The BPHC provider staff must familiarize themselves with Medicaid waiver services and coordinate the provision of BPHC service activities with the waiver case manager. BPHC provider agencies must have written policies and procedures to ensure communication and collaboration with waiver case management and wellness coordination providers. All communications and interactions with HCBS waiver providers must be documented in the clinical record. To avoid duplication of services, BPHC provider staff must develop and document a detailed description of BPHC and HCBS waiver services such as case management, healthcare coordination or wellness coordination activities the applicant or member is receiving. BPHC provider staff must document attempts to coordinate with the HCBS waiver provider. This service overview must clearly define both HCBS waiver and BPHC provider staff roles and responsibilities, and specific goals in the member's IICP that the services are addressing.

### ***Utilization of HCBS Benefit***

Participation in HCBS is determined through claim activities specific to BPHC as well as BPHC provider case notes. According to the Centers for Medicare & Medicaid Services (CMS), to be deemed a current, actively enrolled participant within the BPHC benefit, BPHC-enrolled members with BPHC service authorization must have at least one unit of BPHC service billed for three dates of service within the 180-day BPHC eligibility period. For each BPHC-delivered service activity, there must be clear documentation in the case notes that support how the authorized BPHC service activity was used to support the member during the plan period. If a member has not utilized the BPHC benefit during the plan period, there must be clear documentation of all efforts to engage the member and the reason why no authorized BPHC activities were delivered during the eligibility period. Chronic nonutilization may result in a denial of BPHC application.



## Section 15: Quality Assurance and Performance Measures

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### Overview of Activities

Provision of the Behavioral and Primary Healthcare Coordination (BPHC) service is dictated by service scope and limitations of the service, as outlined in the Centers for Medicare & Medicaid Services (CMS)-approved BPHC Service State Plan Amendment (SPA) and supported by *Indiana Administrative Code 405 IAC 5-21.8* (Indiana rule for administration of the BPHC service), as well as the needs of the member documented in the BPHC evaluation and the Indiana Family and Social Services Administration (FSSA) Division of Mental Health and Addiction (DMHA)-approved Individualized Integrated Care Plan (IICP). The DMHA and FSSA Office of Medicaid Policy and Planning (OMPP) hold the BPHC provider agencies accountable for following all BPHC and Medicaid policies, regulations and standards, and monitor provider agencies for compliance with those standards through the following methods:

- *Core Medicaid Management Information System (CoreMMIS) Data Audits:* Audits of electronic BPHC service data, which includes data on referrals, IICPs and service utilization (in the form of claims). To ensure provider agency compliance with BPHC and the DMHA's expectations of the agency as a BPHC provider, site reviews are completed for each provider agency at least annually.
- *On-Site or Remote Reviews:* The DMHA conducts on-site or remote reviews with the provider agencies on a regularly scheduled cycle, or as needed based on indicators of service delivery issues, such as complaints or serious events. The DMHA reviews a sample of the provider agency's client records, including case notes, IICPs, and documentation of serious events. The DMHA conducts a review of the agency's policies and business processes relating to the BPHC member's freedom of choice, the member's right to lodge grievances and complaints, and provider agency compliance with BPHC standards and expectations.
- *Collection of Performance Measure Data:* The BPHC service-related data collected or requested from provider agencies supports performance measures used to monitor and assure compliance with BPHC quality standards, as noted in the 1915(i) SPA. Performance measure activities include analysis of claims data, review of all IICPs, assessing appropriateness of services delivered based on IICP, provider site visits, and tracking and monitoring incident reports.
- *Incidents and Complaints:* The DMHA monitors incidents, member complaints and administrative reviews related to the BPHC service. The DMHA staff review the data on a regular basis to identify trends or issues that may require training, policy clarification, process improvement or other follow-up. The data is maintained and summarized quarterly.

Quality improvement (QI) data collected is concurrent with the Quality Improvement Measures outlined in the [BPHC SPA](#). Utilization data and results of site visits are compiled and maintained for the DMHA and the OMPP review. Quality assurance (QA) data is collected and reviewed quarterly. Findings from site reviews are used for necessary individual agency corrective action, as well as training and education for all provider agencies.

### Corrective Action

The DMHA issues corrective actions against any provider agency failing to follow BPHC policies, standards and regulations. Failure on the part of the agency to respond to a corrective action imposed by the DMHA by the date prescribed in the review findings report may result in additional corrective action, such as denying service claims or revoking approval of the provider as a BPHC provider agency. The Corrective Action Plan (CAP) is monitored by the DMHA and the OMPP to ensure correction occurs and that remediation is effective in addressing any issues identified. The DMHA conducts follow-up reviews when

significant issues have been discovered; a pattern of complaints regarding the BPHC service is provided; or no progress is made on remediation actions identified in the CAP.



## Section 16: Fair Hearings and Appeals

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The Indiana Family and Social Services Administration (FSSA) Office of Administrative Law Proceeding (OALP) is an administrative section in the FSSA that receives and processes appeals from people receiving services in FSSA programs, including Behavioral and Primary Healthcare Coordination (BPHC) and many other programs. Administrative hearings are held throughout the state of Indiana, usually at county FSSA Division of Family Resources (DFR) locations, at which time all parties have the opportunity to present their cases to an administrative law judge (ALJ).

### Appeal and Fair Hearing Rights

Service authorizations sent to an applicant or member provide an explanation of the decision made on an application for services or a change in services. When an individual disagrees with the decision, they have the right to appeal by submitting a request for a fair hearing.

### Requesting an Appeal

Any of the following individuals may appeal an adverse agency action by the FSSA Division of Mental Health and Addiction (DMHA) State Evaluation Team (SET) and request an administrative hearing:

- An applicant
- A member of BPHC
- A duly authorized representative of an applicant or a member

An authorized representative (AR), applicant or member appealing an action under this rule must follow the appeal processes and procedures in *Indiana Administrative Code 405 IAC 1.1*. Administrative hearings and appeals by an applicant or member are governed by the procedures, time limits, provisions and requirements set forth in *405 IAC 1.1*.

Appeals must be received by close of business no later than:

- Thirty-three calendar days following the effective date of the action being appealed
- Thirty-three calendar days from the date of the notice of agency action

To file an appeal, a signed and dated appeal form must be sent to:

**Indiana Family and Social Services Administration**  
**Office of Administrative Law Proceedings**  
**402 W. Washington St., Room E034**  
**Indianapolis, IN 46204**  
**Fax: 317-232-4412**  
**Email: [fssa.appeals@oalp.in.gov](mailto:fssa.appeals@oalp.in.gov)**



## ***Section 17: Grievances and Complaints***

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Any of the following individuals shall have the right to file a written complaint or a written grievance with the state, the Indiana Family and Social Services Administration (FSSA) Division of Mental Health and Addiction (DMHA) or the FSSA Office of Medicaid Policy and Planning (OMPP):

- An applicant
- A member of the Behavioral and Primary Healthcare Coordination (BPHC) service
- Duly authorized representatives of an applicant or a member

Upon receipt of a complaint or a grievance, the DMHA shall:

1. Log the complaint or grievance
2. Initiate an investigation

The DMHA's decision with regard to a complaint or a grievance may not be appealed. The filing of a complaint or grievance is not a prerequisite to filing an appeal under [Section 16: Fair Hearings and Appeals](#).

If the DMHA sends a letter to a provider agency under this section stating its findings regarding a complaint or a grievance of an applicant or a member, the following shall apply:

- The DMHA may require the provider agency to correct an identified deficiency within a timeline established by the DMHA.
- A provider agency's failure to correct the deficiency within the established timeline may result in sanctions up to, and including, decertification of the provider agency, which would result in revocation of the approval of the provider as a BPHC provider agency.



## Section 18: BPHC Service Billing

This section outlines the Behavioral and Primary Healthcare Coordination (BPHC) service billing guidelines, claim format and necessary billing-related information. Moreover, an explanation of actual time spent conducting service versus time billed, modifiers and other helpful billing-related items are included with examples. Indiana Health Coverage Programs (IHCP) providers are responsible for reading and understanding portions of the *Indiana Administrative Code (IAC)* and manuals and modules that apply to their areas of services. Managed care programs that are eligible for BPHC are billed as fee for service as well. For more information about general billing, see *405 IAC 1* and the [Home- and Community-Based Services Billing Guidelines](#) provider reference module at [in.gov/medicaid/providers](http://in.gov/medicaid/providers).

### Billing Standards

BPHC provider agencies are Medicaid-eligible billing agencies. As such, provider agencies are bound to adhere to all Medicaid billing rules, policies and processes. In regard to the BPHC service, the following applies:

- IHCP rendering Provider IDs are assigned to physicians or health service providers in psychology (HSPPs). The rendering Provider IDs are linked to the group Provider ID of the participating billing group.
- Reimbursement is 100% of the rate for all staff meeting provider qualifications for each service type (that is, Tier 1 and Tier 2).
- Providers are responsible for internally tracking BPHC service utilization to ensure that service units are available. Providers may confirm service unit availability via the IHCP Provider Healthcare Portal (IHCP Portal), the state's recognized final reference for this information.
- Units of the BPHC service, as displayed in the IHCP Portal, are decremented based on adjudicated claims. Failure to submit claims in a timely fashion may place the provider at risk for nonpayment.
- For a BPHC provider to receive reimbursement for the delivery of BPHC service activities, a member must have been deemed eligible for the BPHC service and must have received an authorization notification confirming the BPHC service is authorized on the Individualized Integrated Care Plan (IICP).
- Providers may access BPHC service approval and authorization dates on the [IHCP Provider Healthcare Portal](#), accessible from the homepage at [in.gov/medicaid/providers](http://in.gov/medicaid/providers).

When billing Medicaid HCBS claims, the provider must consider the following:

- The IHCP does not reimburse time spent by office staff billing claims.
- Providers may bill only for those services authorized on an approved service authorization.
- A claim may include dates of service within the same month. Claims may not be submitted with dates that span more than one month on the same claim.
- The units of service as billed to the IHCP must be substantiated by documentation in accordance with the appropriate *Indiana Administrative Code (IAC)* regulations and the 1915(i) documentation standards issued by the Indiana Family and Social Services Administration (FSSA) Office of Medicaid Policy and Planning (OMPP) and the FSSA Division of Mental Health and Addiction (DMHA).
- Services billed to the IHCP must meet the service definitions and parameters as published in the aforementioned rules and standards.

Updated information is disseminated through IHCP provider bulletins posted on the [IHCP Bulletins](#) webpage at [in.gov/medicaid/providers](http://in.gov/medicaid/providers) and announcements on the [DMHA website](#) at [in.gov/fssa/dmha](http://in.gov/fssa/dmha). Each

provider is responsible for obtaining the information and implementing new or revised policies and procedures as outlined in these notices.

## Claim Form

BPHC claims are billed on the paper *CMS-1500* claim form (Centers for Medicare & Medicaid Services authorized professional claim form) or electronically via the 837P transaction or the IHCP Portal professional claim submission option. The IHCP Portal is an interactive web application that allows providers to access the Core Medicaid Management Information System (*CoreMMIS*) (Indiana's Medicaid Management Information System) through the internet. The portal is fast, free and does not require special software. For detailed billing instructions, see the [Claim Submission and Processing](#) provider reference module at [in.gov/medicaid/providers](http://in.gov/medicaid/providers).

Updated information is disseminated through IHCP provider bulletins posted on the [IHCP Bulletins](#) webpage at [in.gov/medicaid/providers](http://in.gov/medicaid/providers). Each provider is responsible for obtaining the information and implementing new or revised policies and procedures as outlined in these notices.

## Facility Fees

No facility fees are paid for the BPHC service.

## BPHC and the Healthy Indiana Plan

Individuals who are enrolled in Healthy Indiana Plan (HIP) and are determined to be medically frail have access to coverage established under the Indiana Medicaid State Plan. The Indiana Medicaid State Plan services include intensive behavioral health Medicaid programs such as Medicaid Rehabilitation Option (MRO)/BPHC/Adult Mental Health Habilitation (AMHH). The intensive community-based behavioral health service programs are carved out from the HIP managed care entities' (MCEs') benefit responsibilities and are billed to the IHCP through the fee-for-service claim payment system.

HIP members deemed medically frail will receive *HIP State Plan* coverage and will be enrolled in *HIP State Plan Plus* and are required to make monthly Personal Wellness and Responsibility (POWER) Account contributions. *HIP State Plan Plus* members are not subject to copays for most services, including the BPHC behavioral health service. Medically frail members enrolled in *HIP State Plan Plus* who do not pay their monthly POWER Account contributions will be enrolled in *HIP State Plan Basic* and are required to pay a \$4 copay for outpatient services; however, the BPHC service is exempt from this copay. No copay is required for the BPHC service for individuals enrolled in *HIP State Plan Basic*.

*Note: As of July 1, 2024, cost-sharing for the HIP program, including POWER account contributions and copays, remains paused.*

More information about the HIP program can be found at the [Healthy Indiana Plan](#) webpage at [in.gov/fssa/hip](http://in.gov/fssa/hip) and in the [Healthy Indiana Plan](#) provider reference module at [in.gov/medicaid/providers](http://in.gov/medicaid/providers).

## Time Documentation

**Staff must document actual time spent delivering services in a 24-hour period within the member's clinical record. For billing purposes, a provider agency must total actual time delivering the same service on the same day by all provider types for each member.** Minutes of service do not have to be consecutive to be billed together.

## ***Rounding Minutes to Units***

Providers may round the total actual time each day, as described previously, to the nearest whole unit when calculating reimbursement.

### ***15-Minute Unit***

If staff delivers a service for eight or more minutes, or the total daily minutes for the service add up to eight or more minutes, the provider may round up to one 15-minute unit. If staff delivers a service for seven minutes or less, or the total daily minutes for the service add up to seven minutes or less, the provider rounds down to zero units and therefore, may not bill for the service. Providers must add actual time together (as described in the [Time Documentation](#) section) before rounding.

## **Modifiers for BPHC Service**

The following modifiers are needed for the submission of BPHC claims.

Table 7 – Service Modifiers for BPHC Service

<b>Modifier</b>	<b>Service Description</b>
UC	Case management for BPHC
UC U3	Case management for BPHC – DMHA certified Integrated Health Technician and/or Certified Peer Recovery Specialist

## **Provider Modifiers**

Modifiers used by providers that bill under a supervising practitioner’s National Provider Identifier (NPI) should not be used when submitting BPHC service claims. The use of these provider modifiers results in the denial of the BPHC service claim.

## **Third-Party Liability Requirements**

The IHCP will not bill private insurance carriers through the third-party liability (TPL) or reclamation processes for claims containing any Home- and Community-Based Services (HCBS) benefit modifier codes. This billing practice includes modifiers specific to claims for the BPHC benefit plan.

## **Financial Oversight**

The state of Indiana uses a variety of means for financial oversight, including, but not limited to audits, oversight to ensure consistency and fraud control.

### ***HCBS Audits***

The state of Indiana employs a hybrid program integrity (PI) approach to overseeing HCBS programs, incorporating oversight and coordination by the Office of Medicaid Policy and Planning (OMPP) Program Integrity staff, as well as engaging the full array of technology and analytic tools available through the Fraud and Abuse Detection System (FADS) contractor arrangements. The FSSA has expanded its PI activities using a multifaceted approach that includes provider self-audits, desk audits and on-site audits. Program Integrity is required to complete an initial assessment of each provider type annually. Then, based on the assessment information and referrals, audits are completed as needed. The FADS team analyzes

claims data, allowing them to identify providers and claims that indicate aberrant billing patterns and other risk factors.

The PI audit process uses data mining, research, identification of outliers, problematic billing patterns, aberrant providers and issues that are referred by other divisions and state agencies. In 2011, the state of Indiana formed a Program Integrity Team comprising key stakeholders that meet biweekly to review and approve audit plans and provider communications, and to make policy and system recommendations to affected program areas. The Program Integrity staff also meets with all HCBS divisions on a quarterly basis, at a minimum, and receives referrals on an ongoing basis to maintain open lines of communication and understanding in specific areas of concern, such as policy clarification.

The Program Integrity staff is responsible for directly coordinating with the HCBS divisions. The Program Integrity staff also analyzes data to identify potential areas of risk and identify providers that appear to be outliers warranting review. Program Integrity may also perform desk or on-site audits and be directly involved in reviewing HCBS providers and programs.

Throughout the entire PI process, the FSSA maintains oversight. Although the FADS contractor may be incorporated in the audit process, no audit is performed without the authorization of the FSSA. The FSSA's oversight of the contractor's aggregate data is used to identify common problems to be audited, determine benchmarks and offer data to peer providers for educational purposes, when appropriate.

The Program Integrity staff offers education regarding key program initiatives and audit issues at waiver provider meetings to promote ongoing compliance with federal and state guidelines, including all IHCP and HCBS requirements.

### ***FSSA Audit Oversight***

The Audit Division of the FSSA reviews HCBS audit team schedules and findings to reduce redundancy and assure use of consistent methodology.

### ***Medicaid Fraud Control Audit Overview***

The Indiana Medicaid Fraud Control Unit (MFCU) is an investigative branch of the Attorney General (AG) Office. MFCU conducts investigations in the following areas:

- Medicaid provider fraud
- Misuse of Medicaid members' funds
- Patient abuse or neglect in Medicaid facilities

When the MFCU identifies a provider that has violated regulations in one of these areas, the provider's case is presented to the state or federal prosecutors for appropriate action. Providers can access information about the MFCU from the [Medicaid Fraud & Patient Abuse](http://in.gov/attorneygeneral) webpage at in.gov/attorneygeneral.

## **Place of Service Codes**

BPHC service activities can be rendered in the following locations with the place of service code listed:

**Table 8 – BPHC Place of Service Codes**

<b>Code</b>	<b>Location</b>
12	Home
99	Other unlisted facility (such as employment or a community place)
53	Community Mental Health Center (CMHC)



## Mailing Address for Claims

BPHC paper claims are sent to the standard medical claim address at Gainwell Technologies:

**Gainwell – CMS-1500 Claims**  
**PO Box 50447**  
**Indianapolis, IN 46250-0418**

## Additional Addresses and Telephone Numbers

Providers should direct questions about filing claims to Customer Assistance toll-free at 800-457-4584. The addresses and telephone numbers are also available on the [IHCP Quick Reference Guide](#) at [in.gov/medicaid/providers](http://in.gov/medicaid/providers).



## Appendix A: BPHC Acronyms and Definitions

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The acronyms and definitions in this appendix apply to Behavioral and Primary Healthcare Coordination (BPHC) and the policies and procedures outlined in this module.

**837P electronic transaction** allows providers to submit professional claims electronically to the Indiana Health Coverage Programs (IHCP). The 837P transaction can be used instead of the IHCP Provider Healthcare Portal (IHCP Portal) professional claim or the *CMS-1500* paper claim form.

**Adult Mental Health Habilitation (AMHH)** refers to medical or remedial services recommended by a licensed professional, as well as a qualified behavioral health professional (QBHP), within the scope of their practice, for the habilitation of a mental disability and the restoration or maintenance of an individual's best possible functional level. Services are clinical and supportive behavioral health services that are provided for individuals, families or groups of adult persons who are living in the community and who need aid on a routine basis for a mental illness or co-occurring mental illness and substance use disorders. AMHH services include the following:

- Adult Day Services
- Home- and Community-Based Habilitation and Support
- Respite Care
- Therapy and Behavioral Support Services
- Addiction Counseling
- Supported Community Engagement Services
- Care Coordination
- Medication Training and Support

**Adult Needs and Strengths Assessment (ANSA)** is the approved Division of Mental Health and Addiction (DMHA) behavioral health assessment tool, administered by a qualified individual who is trained and DMHA-certified to administer the tool to assist in determining the level of need (LON) and functional impairment of an applicant or member.

**Applicant** means an individual applying for the Behavioral and Primary Healthcare Coordination (BPHC) service by inquiring about the BPHC service or completing the BPHC application process.

**Assistance** means any kind of support given due to a behavioral health condition or disorder. This support includes, but is not limited to, the following:

- Mentoring
- Supervision
- Reminders
- Verbal cueing
- Hands-on assistance

**Authorized healthcare professional (AHCP)** means any of the following persons:

- A physician's assistant with the authority to prescribe, dispense and administer drugs and medical devices or services under an agreement with a supervising physician and subject to the requirements of *Indiana Code IC 25-27.5-5*

- A nurse practitioner (NP) or clinical nurse specialist (CNS) with prescriptive authority and performing duties within the scope of that person's license and under the supervision of, or under a supervisory agreement with, a licensed physician, pursuant to *IC 25-23-1*

**Behavioral and Primary Healthcare Coordination (BPHC)** refers to coordination of healthcare services to manage the healthcare needs of the member, including direct assistance in gaining access to health services, coordination of care within and across systems, oversight of the entire case, and linkage to appropriate services.

**Care coordinator** means the Division of Mental Health and Addiction (DMHA)-approved Behavioral and Primary Healthcare Coordination (BPHC) provider staff overseeing or managing the BPHC service member's case while the individual is enrolled in BPHC.

**Centers for Medicare & Medicaid Services (CMS)** is the federal agency that has authority over the 1915(i) State Plan Amendments in each state. The CMS must approve the state's requests to implement the federally funded State Plan Amendment and all subsequent program amendments and funding.

**Certified integrated health technician (IHT)** refers to an individual who is certified to deliver services as defined at *405 IAC 5-21.8-8(a)*. To be certified as an IHT, an individual must have completed the IHT Division of Mental Health and Addiction (DMHA) and Indiana Department of Health (IDOH) state-approved training program and received a passing score on the certification exam. The IHT is supervised by a licensed professional or qualified behavioral health professional (QBHP) (as defined in this section) and remains in good standing.

**Certified Peer Support Professional (CPSP)** is an individual who utilizes their lived experience combined with formal training to instill hope, inspire change and support other individuals through similar experiences, using personal connection, person-centered care and their shared understanding to navigate their life in recovery. To be certified as a CPSP, an individual must meet the following criteria:

- Meet one of both of the following:
  - Individual living in recovery with a mental health and/or substance use condition
  - Family member to another person living with a mental health and/or substance use condition.
- Successfully complete Division of Mental Health and Addiction (DMHA) CPSP training and receive a passing score on the certification exam.

A CPSP is supervised by a Certified Peer Supervisor, a licensed professional or qualified behavioral health professional (as defined in this section) and remains in good standing.

Rule changes are forthcoming to reflect updates to the certification. For more information, see the [Indiana Certified Peer Support Professionals](https://www.in.gov/fssa/dmha/certified-peer-support-professionals) webpage at [in.gov/fssa/dmha](https://www.in.gov/fssa/dmha).

Certified recovery specialist (CRS) and community health worker (CHW) are included under the CPSP certification.

**CMS-1500** is the Centers for Medicare & Medicaid Services (CMS)-authorized professional claim form used to submit paper claims to the Medicaid fiscal contractor for reimbursement of rendered, Division of Mental Health and Addiction (DMHA)-approved Home- and Community-Based Services (HCBS).

**Community-based** refers to the Behavioral and Primary Healthcare Coordination (BPHC) service approved by the Centers for Medicare & Medicaid Services (CMS) to be provided within the individual's home (or place of residence), or at other locations based in the community (outside institutional settings).

**Community Integration and Habilitation (CIH) Waiver** provides services that enable individuals with developmental disabilities to remain in their homes or in community settings and assists people who transition from state-operated facilities or other institutions into community settings. This waiver is designed to provide supports for persons to gain and maintain optimum levels of self-determination and community integration while allowing flexibility in the provision of those supports.

**Community mental health center (CMHC)** is approved as such by the Division of Mental Health and Addiction (DMHA) under *440 IAC 4.1-2-1*. The CMHCs offer communities access to a full continuum of behavioral health services.

**Consumer Service Line** is a toll-free line for consumers to share complaints, questions and concerns about services, treatments, procedures, rights and policies. The line is open Monday through Friday from 8:30 a.m. to 5 p.m. The Division of Mental Health and Addiction (DMHA) contractor processes calls and informs the DMHA. The toll-free number is 800-901-1133. Deaf, hard-of-hearing or speech-impaired individuals can dial 7-1-1 to access the Consumer Service Line.

**CoreMMIS** is Indiana's Medicaid Management Information System (MMIS) or claim-payment system.

**CMHC provider owned, controlled or operated (POCO)** residential setting is a specific physical place where a member lives that is owned, leased or co-leased by a community mental health center (CMHC) provider of Home- and Community-Based Services (HCBS).

**Data Assessment Registry Mental Health and Addiction (DARMHA)** supports the use of information about the strengths and needs of individuals to help make decisions, to monitor progress and to improve quality. DARMHA is also the system by which the Behavioral and Primary Healthcare Coordination (BPHC) application is entered and submitted to the Division of Mental Health and Addiction (DMHA) for review.

**Division of Aging (DA)** is the division within the Indiana Family and Social Services Administration (FSSA) that is responsible for processing Preadmission Screening and Resident Review (PASRR) requests.

**Division of Disability and Rehabilitative Services (DDRS)** is the division within the Indiana Family and Social Services Administration (FSSA) that oversees four 1915(c) Home- and Community-Based Services (HCBS) waiver programs: the Community Integration and Habilitation (CIH), Family Supports Waiver (FSW), Health and Wellness (H&W), and the Traumatic Brain Injury (TBI) waivers.

**Division of Family Resources (DFR)** is the division within the Indiana Family and Social Services Administration (FSSA) responsible for processing applications and approving eligibility for Medicaid, Temporary Aid for Needy Families (TANF, or cash assistance), childcare assistance, Supplemental Nutrition Assistance Program (SNAP, or food stamps) and employment and training services for low-income clients.

**Division of Mental Health and Addiction (DMHA)** is the division within the Indiana Family and Social Services Administration (FSSA) with responsibility for the daily operation of Behavioral and Primary Healthcare Coordination (BPHC).

**Gainwell Technologies** is the Indiana Medicaid fiscal agent responsible for maintaining the Core Medicaid Management Information System (*CoreMMIS*) database of all Indiana Health Coverage Programs (IHCP) providers and members – including enrolled Behavioral and Primary Healthcare Coordination (BPHC) providers and approved BPHC participants, as well as their authorized BPHC services approved by the Division of Mental Health and Addiction (DMHA). Gainwell performs claim processing and reimbursement for eligible providers of BPHC and other fee-for-service, nonpharmacy Medicaid services. Gainwell assigns IHCP Provider IDs required for reimbursement of all IHCP claims. Gainwell also maintains the IHCP provider website and all provider reference modules.

**Family and Social Services Administration (FSSA)** is the Indiana state agency that includes the Division of Aging (DA), Division of Disability and Rehabilitation Services (DDRS), Division of Family Resources (DFR), Division of Mental Health and Addiction (DMHA), and Office of Medicaid Policy and Planning (OMPP).

**Family Supports Waiver (FSW)** provides limited, nonresidential supports to individuals with developmental disabilities who live with their families or in other community settings with informal supports.

**Fraud and Detection Systems (FADS)** is a means established by a Medicaid agency that maintains methods, criteria and procedures that meet all requirements of 42 CFR 455.13 through 455.21 and 455.23 for prevention and control of program fraud and abuse.

**Habilitation services** are activities that are designed to assist individuals in acquiring, retaining and improving the self-help, socialization and adaptive skills necessary to reside successfully in community settings

**Health** means physical and behavioral well-being.

**Health and Wellness (H&W) Waiver** provides an alternative to nursing facility admission for Medicaid-eligible persons ages 59 and younger with a disability. The waiver is designed to provide services to complement and supplement informal supports for people who would require care in a nursing facility if waiver services or other supports were not available. The services available through this waiver are designed to help members remain in their own homes, as well as to help individuals residing in nursing facilities to return to community settings, such as their own homes, apartments, assisted living or adult family care.

**Health Insurance Portability and Accountability Act of 1996 (HIPAA)** refers to mandated requirements for the adoption of national standards for healthcare, including the protection of health information and standard unique identifiers for all healthcare providers, as well as coding healthcare services for approving, billing, reimbursing and tracking.

**Health service provider in psychology (HSPP)** as defined by IC 25-33-1.

**Home- and Community-Based Services (HCBS)** refers to services approved by the Centers for Medicare & Medicaid Services (CMS) to be provided within the Medicaid member's home (or place of residence) or at other locations based in the community (outside the institutional setting). For Medicaid purposes, *HCBS* generally refers to home- and community-based services programs authorized by the CMS under Section 1915(c) of the *Social Security Act*.

**Indiana Administrative Code (IAC)** refers to the Indiana state policy and procedures.

**Indiana Code (IC)** consists of Indiana state statutes that govern the Indiana Administrative Code (IAC).

**Indiana Health Coverage Programs (IHCP)** is Indiana's Medicaid program, collectively referred to as the Indiana Health Coverage Programs (IHCP). The IHCP provides a healthcare safety net for low-income children and adults, including those who are aged, disabled, blind, pregnant or meet other eligibility requirements. The IHCP receives federal and state funds to operate the program and reimburse providers for reasonable and necessary medical care for eligible members. Each state administers its own Medicaid program within the provisions of federal legislation and broad federal guidelines issued by the Centers for Medicare & Medicaid Services (CMS). The Indiana Family and Social Services Administration (FSSA) administers the IHCP. The IHCP includes the 590 Program, Healthy Indiana Plan (HIP), Hoosier Care Connect, Hoosier Healthwise, including Children's Health Insurance Program (CHIP), Indiana PathWays for Aging (PathWays) and Traditional Medicaid.

**Indiana Health Coverage Programs Provider Healthcare Portal (IHCP Portal)** is a secure, web-based tool where Behavioral and Primary Healthcare Coordination (BPHC) providers may view BPHC authorization, claim and other information. Provider enrollment, provider profile updates and claims (including claims for Division of Mental Health and Addiction (DMHA)-approved BPHC activities rendered) may also be submitted via the IHCP Portal. The [IHCP Portal](#) is accessible from the homepage at [in.gov/medicaid/providers](https://in.gov/medicaid/providers). For more information about using the IHCP Portal, see the [Provider Healthcare Portal](#) provider reference module at [in.gov/medicaid/providers](https://in.gov/medicaid/providers).

**Indiana PathWays for Aging (PathWays) Waiver** provides an alternative to nursing facility admission for people who are age 60 and older by providing supports to complement and supplement informal supports for persons who would require care in a nursing facility if waiver services or other supports were not available. The services available through this waiver are designed to help members remain in their own

homes, as well as to help individuals residing in nursing facilities to return to community settings, such as their own homes, apartments, assisted living or adult family care.

**Individualized Integrated Care Plan (IICP)** means a treatment plan that:

- Integrates all components and aspects of care that are:
  - Deemed medically necessary
  - Needs-based
  - Clinically indicated
  - Provided in the most appropriate setting to achieve the member's goals
- Includes all indicated medical and support services needed by the member to:
  - Remain in the community
  - Function at the highest level of independence possible
  - Achieve goals identified in the IICP
- Is developed for each member
- Is developed with the member
- Reflects the member's desires and choices

**Individual provider** is a provider that practices privately and not under an agency.

**Level of need (LON)** means a recommended intensity of behavioral health services, based on a pattern of an individual's and family's needs, as determined by using the Division of Mental Health and Addiction (DMHA)-approved behavioral health standardized assessment tool, the Adult Needs and Strengths Assessment (ANSA).

**Licensed professional** means any of the following persons:

- Licensed physician (including licensed psychiatrist)
- Licensed psychologist or a psychologist endorsed as a health service provider in psychology (HSPP)
- Licensed clinical social worker (LCSW)
- Licensed mental health counselor (LMHC)
- Licensed marriage and family therapist (LMFT)
- Licensed clinical addiction counselor (LCAC), as defined under *Indiana Code IC 25-23.6-10.5*

**Managed care entity (MCE)** is an entity contracted to provide and manage benefits for members enrolled in a managed care program, such as the Healthy Indiana Plan (HIP), Hoosier Care Connect, Hoosier Healthwise or Indiana PathWays for Aging (PathWays). In a full-risk contract, the MCE agrees to provide all benefits on a per-member per-month basis, known as full capitation.

**Medicaid Rehabilitation Option (MRO) services** are any medical or remedial service recommended by a physician or other licensed practitioner of the healing arts, within the scope of their practice under state law, for the maximum reduction of physical or mental health disability and restoration of a member to their best possible level of functioning.

**Member** means an individual who has been approved by the Division of Mental Health and Addiction (DMHA) State Evaluation Team (SET) for the Behavioral and Primary Healthcare Coordination (BPHC) service and Medicaid.

**Member ID** is the member identification number, also known as RID, used to identify individuals eligible for Indiana Health Coverage Programs (IHCP) services, including tracking and claim processing for eligible services.

**Money Follows the Person (MFP)** is a demonstration grant to help move individuals from institutional settings to home- and community-based settings.

**National Provider Identifier (NPI)** is the 1996 *Health Insurance Portability and Accountability Act* (HIPAA)-mandated standard unique identifier for all healthcare providers. Unique NPIs are assigned by application to the National Plan and Provider Enumeration System that collects identifying information on healthcare providers.

*Note: An assigned NPI is not needed for Behavioral and Primary Healthcare Coordination (BPHC) service providers that do not perform healthcare services. Home- and Community-Based Services (HCBS) providers may submit claims using their IHCP Provider ID.)*

**Needs-based eligibility criteria** are factors used to determine an applicant's requirement for Behavioral and Primary Healthcare Coordination (BPHC) service activities. The applicant meets the BPHC needs-based eligibility criteria when the following is demonstrated:

- Needs related to management of their health
- Impairment in self-management of health services
- A health need that requires assistance and support in coordinating health treatment
- A recommendation for intensive community-based care based on the uniform Division of Mental Health and Addiction (DMHA)-approved behavioral health assessment tool, as indicated by a rating of 3 or higher

**Non-CMHC provider owned, controlled or operated (POCO)** residential setting is a specific physical place where a member lives that is owned, leased or co-leased by a provider of Home- and Community-Based Services (HCBS) *other than a community mental health center (CMHC)*.

**Non-POCO** residential setting refers to settings owned, controlled or operated by either a not-for-profit organization or an independent setting operating authority rather than a community mental health center (CMHC).

**Nonprofessional caregiver** means any individual who does not receive compensation for providing care or services to a Medicaid member.

**Office of Medicaid Policy and Planning (OMPP)** is the division within the Indiana Family and Social Services Administration (FSSA) that administers the Indiana Health Coverage Programs (IHCP) in accordance with federal and state requirements, which includes responsibility for financial oversight of the Home- and Community-Based Services (HCBS) program. The OMPP manages the Indiana PathWays for Aging (PathWays) Waiver and provides authority and oversight of the Indiana PathWays managed care program.

**Other behavioral health professional (OBHP)** means any of the following:

- An individual with an associate or bachelor's degree, or two years equivalent behavioral health experience, meeting minimum competency standards set forth by a behavioral health service provider and supervised by either a licensed professional or a qualified behavioral health professional (QBHP).
- A licensed addiction counselor, as defined under *IC 25-23.6-10.5*, supervised by either a licensed professional or a QBHP.

**Outpatient mental health services** refers to services defined under *405 IAC 5-20-8*, formerly referred to as "Medicaid Clinic Option" services.

**Participant** refers to an individual who has been deemed eligible for Home- and Community-Based Services (HCBS) by the Division of Mental Health and Addiction (DMHA).



**Physician consults**, in the context of the Behavioral and Primary Healthcare Coordination (BPHC) service, is defined as facilitating linkage and communication between medical providers.

**Provider agency** means any of the Division of Mental Health and Addiction (DMHA) state-certified community mental health centers (CMHCs) that meet required qualifications and criteria that can employ rendering providers to deliver the Behavioral and Primary Healthcare Coordination (BPHC) service.

**Provider ID** is a unique identifier, formerly referred to as the Legacy Provider Identifier (LPI), assigned to Indiana Health Coverage Programs (IHCP)-enrolled providers, including service providers, for submission of all claims for IHCP reimbursement. This number is assigned by the Medicaid fiscal agent during the provider enrollment process.

**Provider staff** means any individual working under a Division of Mental Health and Addiction (DMHA)-approved Behavioral and Primary Healthcare Coordination (BPHC) provider agency that meets the qualifications and requirements mandated by the BPHC service being provided.

**Provider owned, controlled or operated (POCO)** refers to the Division of Mental Health and Addiction (DMHA) reference to community mental health centers (CMHCs), Home- and Community-Based Services (HCBS) service locations and residential settings for HCBS members. However, POCO, as defined by the Centers for Medicare & Medicaid Services (CMS), applies to all settings that a HCBS member resides in or receives services in and any provider, not just CMHCs.

**Qualified behavioral health professional (QBHP)** means any of the following:

- An individual who has had at least two years of clinical experience treating persons with behavioral health diagnosis under the supervision of a licensed professional, with such experience occurring after the completion of a master's degree or doctoral degree, or both, in any of the following disciplines from an accredited university:
  - Psychiatric or mental health nursing, plus a license as a registered nurse in Indiana
  - Pastoral counseling
  - Rehabilitation counseling
- An individual who is under the supervision of a licensed professional and is eligible for and working toward professional licensure, and has completed a master's or doctoral degree, or both, in any of the following disciplines from an accredited university:
  - Social work from a university accredited by the Council on Social Work Education
  - Psychology
  - Mental health counseling
  - Marital and family therapy
- A licensed independent practice school psychologist under the supervision of a licensed professional.
- An authorized healthcare professional (AHCP) who is one of the following:
  - A physician assistant with the authority to prescribe, dispense and administer drugs and medical devices or services under an agreement with a supervising physician and subject to the requirements of IC 25-27.5-5.
  - A nurse practitioner (NP) or clinical nurse specialist (CNS), with prescriptive authority and performing duties within the scope of that person's license and under the supervision of, or under a supervisory agreement with, a licensed physician, pursuant to IC 25-23-1.

**Residential Settings Screening Tool (RSST)** is the Division of Mental Health and Addiction (DMHA) Home- and Community-Based Services (HCBS) tool used to screen for HCBS compliance in a member's current living situation.

**Recreational** means activities people do to relax or have fun (for example, activities done for enjoyment).

**Service authorization** is a written notice given to each Home- and Community-Based Services (HCBS) applicant and participant for any action that will affect their HCBS benefits. The service authorization or notice of action (NOA) includes actions to approve or deny an applicant's eligibility for HCBS; all Division of Mental Health and Addiction (DMHA)-approved Behavioral and Primary Healthcare Coordination (BPHC) benefits; all subsequent changes to increase, reduce or terminate any or all HCBS; the effective dates and reasons for the actions taken; and the individual's appeal rights. The designated service providers also receive a copy of the service Authorization or NOA for prior authorization to provide and bill the IHCP for the DMHA-approved services. The IHCP will deny reimbursement for any service that is not listed on the service Authorization or NOA or that exceeds the DMHA-approved amount of each service.

**State Evaluation Team (SET)** means the Division of Mental Health and Addiction (DMHA) independent evaluation team that reviews and assesses all evaluation information and supporting clinical documentation collected for Behavioral and Primary Healthcare Coordination (BPHC) applicants and members, and is responsible for making final determinations regarding the following:

- Needs-based and target-group eligibility of applicants for the BPHC service
- Authorization for the BPHC service for eligible members
- Continued eligibility determination for BPHC members
- Appropriate service delivery to BPHC members, as a result of conducting quality improvement reviews of BPHC service provider agencies

**Target-Group Eligibility Criteria** are factors used to determine an applicant's eligibility for the Behavioral and Primary Healthcare Coordination (BPHC) service. To meet the BPHC target-group criteria, an applicant must be age 19 or older and be diagnosed with a BPHC eligible primary behavioral health diagnosis.

**Traumatic Brain Injury (TBI) Waiver** provides services to Medicaid-eligible people of any age who have experienced an external insult resulting in a traumatic brain injury and require services ordinarily available only in a nursing facility (NF) or intermediate care facility for individuals with intellectual disabilities (ICF/IID). Birth trauma-related injuries are not included.

## Appendix B: BPHC Application Screen Shots

This appendix contains the Behavioral and Primary Healthcare Coordination (BPHC) application screens in the Data Assessment Registry Mental Health and Addiction (DARMHA) and instructions on how to complete the screens.

Figure 1 – Page 1 of BPHC Application – General Tab (Top Half)

### BPHC Application View

General
IICP Form
History Logs

*Data below is pulled from the DARMHA record provided. Errors need to be fixed in the DARMHA record.*

IICP ID :  
DARMHA ID :  
Internal ID :  
Applicant Last Name :  
Applicant First Name :  
Applicant Middle Name :

DOB :                      Age : (YEARS) ✓  
Diagnosis on List : ✓

Diag 1    Diag 2    Diag 3    Diag 4 (n/a)    Diag 5 (n/a)

ANSA within 60 Days : 56 ✓  
ANSA LON 3, 4 or 5 : 3 ✓  
Medicaid ID :  
Social Security No. : ✗

#### Applicant Information

Home Address 1 :

Address 2 :

City :

State :

Zip Code :

Email Address :

Phone : (xxx-xxx-)  Ext. :

Health Questions : ✓

The consumer is on one of the following waivers: [\(Click to Select\)](#)

- Community Integration and Habilitation Waiver
- Family Supports Waiver
- Aged and Disabled Waiver
- Traumatic Brain Injury Waiver
- Money Follows the Person
- Unknown whether consumer is on waiver
- Consumer is on a waiver, unsure which waiver
- Not on a waiver

Figure 1 shows the top half of the General tab of the application. Information in the top-left box is automatically imported from the member's DARMHA record, so all that information must be checked for accuracy and, if necessary, corrections made in the member's DARMHA record before the application is submitted.

In the top-right box, *Applicant Information*, the current home address and telephone number must be entered (the member's email address is NOT required). This address is the home mailing address to which the member's BPHC approval or denial notice is sent; therefore, it is critical that this information is accurate. Members must be asked where they prefer to receive BPHC notices. If the member is homeless or does not have or is unwilling to provide an address, the community mental health center (CMHC) address may be entered, if the member consents. A Post Office (P.O.) Box is acceptable in the Home Address 1 field only if the physical address of the client is entered in the Address 2 field.

The applicant must be asked if they are participating in a Home- and Community-Based Services (HCBS) waiver program. As described in [Section 14: Behavioral and Primary Healthcare Coordination Service](#), (BPHC) service providers are responsible, in collaboration with 1915(c) HCBS waiver providers, for monitoring services of BPHC members also enrolled in a 1915(c) waiver program to prevent service duplication. Using the drop-down menu, the BPHC provider must select the appropriate option.

Figure 2 – Page 1 of BPHC Application – General Tab (Current Living Situation)

**Current Living Situation :**

Community-based Settings:

- ☐ Homeless
- ☐ Private/Independent Home
- ☐ Non-POCO Residential setting
- ☐ Non-CMHC POCO Residential setting
- ☐ POCO Residential Setting
- ☐ Potential Presumed Institutional setting

Institutional Settings:

- ☐ Nursing Home
- ☐ Hospital
- ☐ Institution for Mental Disease (IMD)
- ☐ ICF/IID
- ☐ Jail/Correctional Facility

Figure 2 shows the *Current Living Situation* section of the application. Click to select the circle (radio button) next to the applicable current living situation **as of the day the application is being completed**. For definitions of community-based and institutional settings, see [Section 4: Home- and Community-Based Residence Requirements](#) and [Section 7: Completing the HCBS Residential Setting Screening Tool](#) in this module.

Figure 3 – BPHC Application View – IICP Form Tab

**Treatment Team Attestation :**

- ☐ The applicant has been given choice of providers
- ☐ The applicant has been given choice of services
- ☐ The proposed IICP is individualized to meet the applicant's need
- ☐ The applicant has participated in the development of the IICP
- ☐ A copy of the IICP that was submitted with this application was offered to the applicant and/or legal guardian
- ☐ Program requirements, including financial requirements, have been reviewed with the applicant
- ☐ The HCBS Residential Setting Screening Tool has been completed with the applicant, a signed copy retained in the clinical record, and the HCBS Member Information Pamphlet was provided to the applicant

Figure 3 shows the attestation options. The applicant or the legal guardian and the case manager or the referring care coordinator must sign the attestations. (The [HCBS Member Information Pamphlet](#) is available at [in.gov/fssa/dmha](http://in.gov/fssa/dmha).)

In addition to the preceding attestations, a signature from the Adult Needs and Strengths Assessment (ANSA) SuperUser reviewing the ANSA must be documented in the clinical record. The date the ANSA SuperUser signs the attestation documenting their review must be entered in the application.

*Note: Hard-copy or electronic signatures from the applicant, legal guardian (if applicable), case manager, referring care coordinator and reviewing ANSA SuperUser must be kept in the member's clinical chart and made available for review by the State Evaluation Team (SET) during quality assurance (QA) site visits. The date of the signature on the attestation must match the date of attestation entered on the BPHC application.*



## Appendix C: CMHC Provider Application and Attestation to Provide BPHC

The community mental health center (CMHC) must complete and submit a *CMHC Provider Application and Attestation to Provide Behavioral and Primary Healthcare Coordination (BPHC)* (see Figure 4) to the DMHA.

Figure 4 – CMHC Provider Application and Attestation to Provide Behavioral and Primary Healthcare Coordination (BPHC)

<p style="text-align: center;"><b>CMHC PROVIDER APPLICATION AND ATTESTATION TO PROVIDE BEHAVIORAL AND PRIMARY HEALTHCARE COORDINATION (BPHC)</b></p> <p>I, _____, CEO of _____ CMHC, attest to the following: _____ CMHC is:</p> <ol style="list-style-type: none"><li>1) A DMHA-certified Community Mental Health Center (CMHC) in good standing;</li><li>2) A provider currently enrolled in the Indiana Medicaid program;</li><li>3) Willing and able to provide BPHC service as described in the 1915(i) State Plan Amendment (SPA) (13-013), BPHC rule (405 IAC 5-21.8), the BPHC Provider Module, and any subsequent amendments to these documents, to meet the identified healthcare management needs of each eligible member; and</li><li>4) Committed to ensuring that members have access to the services and supports needed to meet his/her individual needs.</li></ol> <p>The signature below attests that _____ CMHC requests to become a DMHA-approved BPHC service provider in the state of Indiana.</p> <table border="0" style="width: 100%;"><tr><td style="width: 50%; text-align: center;">_____ <i>Community Mental Health Center CEO</i></td><td style="width: 50%; text-align: center;">_____ <i>Date</i></td></tr><tr><td colspan="2" style="text-align: center;">_____ Printed Name</td></tr></table>	_____ <i>Community Mental Health Center CEO</i>	_____ <i>Date</i>	_____ Printed Name	
_____ <i>Community Mental Health Center CEO</i>	_____ <i>Date</i>			
_____ Printed Name				





## **Appendix D: BPHC Application Status Codes**

Table 9 provides the status codes that are viewable in the *Application Status* field of the Behavioral and Primary Healthcare Coordination (BPHC) application in Data Assessment Registry Mental Health and Addiction (DARMHA). The status code is updated whenever a new action is taken on a BPHC application. Providers can use this code to track where an application is in the process.

**Table 9 – BPHC Application Status Codes**

<b>Status Code</b>	<b>Description</b>
Discarded	The application was discarded by the provider or was in draft mode for more than 60 days and was discarded by the Division of Mental Health and Addiction (DMHA) State Evaluation Team (SET). Applications discarded for either reason have not been submitted for review by the DMHA SET.
Draft	A draft was saved by the provider. The application has not yet been submitted for review by the DMHA SET.
Submitted	The application was submitted by the provider and is undergoing the DMHA SET review. The SET has 10 business days to review an application and render a decision.
DMHA Pending	The application was pended by the DMHA SET for review and potential updates to be made by the provider (that is, the supporting documentation is inconsistent or insufficient for the DMHA SET to make a clinical eligibility determination). If the pended application is not resubmitted within seven calendar days from the date that the SET pended the application, the application will be subject to denial based on the original submission.
DMHA Approved	The application has been clinically approved for BPHC eligibility by the DMHA SET and will be forwarded to the Division of Family Resources (DFR) for review of nonclinical Indiana Health Coverage Programs (IHCP) eligibility.
DMHA Denied	The application has been clinically denied by the DMHA SET. Therefore, the individual is not BPHC-eligible. The provider needs to review and reach out to the client for next steps.
Modifications Approved	The DMHA SET has approved updates to an application that was previously pended.
DFR Pending	Clinically approved application has been sent to the DFR for nonclinical IHCP eligibility determination. The application is being reviewed by the DFR, and so eligibility questions should be directed to the DFR.
DFR Approved	The application has been clinically approved by the DMHA SET and approved by the DFR for IHCP eligibility. The file will be sent to Gainwell Technologies (the Indiana Medicaid fiscal agent) for service package assignment.
DFR HP [Gainwell] Conditional	The applicant was clinically approved by the DMHA SET and the individual was determined to meet IHCP criteria by the DFR. However, IHCP coverage has not yet been activated due to an outstanding required action that needs to be completed. There may be issues such as a form missing, an appointment missed, premium not received, and so on. BPHC provider agencies should follow their normal protocols for assisting consumers with IHCP eligibility.

Status Code	Description
DFR Denied	The application has been clinically approved by the DMHA SET, but the DFR found the individual ineligible for IHCP. Therefore, the individual is not currently BPHC-eligible.
DFR Mismatch	Applicant data (such as date of birth, Social Security number and name) entered in DARMHA does not match the information in the Indiana Eligibility Determination Services System (IEDSS). The DMHA will notify the BPHC provider agency if action is required by the provider to update the applicant's record in DARMHA.
Gainwell Data Sent	The applicant was clinically approved by the DMHA SET and met IHCP eligibility criteria with the DFR. This information has been sent to Gainwell for service package assignment.
Gainwell End Date Changed	A BPHC service package was created by Gainwell and adjusted to align with the Medicaid Rehabilitation Option (MRO) end date.
Gainwell Processed	The individual is fully approved for BPHC and a service package assignment has been generated by Gainwell. BPHC start and end date and assigned units are viewable in the IHCP Provider Healthcare Portal (IHCP Portal).
Not Approvable	The submitted application is beyond its end date and has expired.

## Appendix E: BPHC Application Report

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The Data Assessment Registry Mental Health and Addiction (DARMHA) system can generate a report indicating the status of all submitted Behavioral and Primary Healthcare Coordination (BPHC) applications:

1. Navigate to the main BPHC application search page by choosing BPHC from the main DARMHA menu. At the BPHC application search page, an empty box labeled **Application Status** has a drop-down menu showing all the available BPHC application status codes.
2. Select a status code to conduct a query of only the BPHC applications that have been assigned that particular status code. If no status code is chosen, all applications created will be listed.
3. Choose **Print Search Result** to generate a report that can be viewed onscreen.
4. To print the report, select the printer icon at the top of the page.
5. To export the report, select the desired file format from the drop-down menu at the top of the screen and select **Export**. Choose **Open** or **Save** from the dialog box.

To exit the report, choose **Close Report** to return to the BPHC main screen.

DARMHA also has the capability to generate a report that is useful in tracking the BPHC package end dates to identify members approaching the submission period to ensure timely submittal of renewal applications and a report that identifies applications that have ended with no BPHC renewal application submitted. The following steps indicate how to generate these reports:

1. Navigate to the main DARMHA screen.
2. Select **Reports** from the menu.
  - a. To identify BPHC applications that have expired and with no new application being submitted, select **BPHC Expired Application No Renewal**.
  - b. To identify current BPHC applications and their expiration dates, select **BPHC Expiring Applications**.



## ***Appendix F: Residential Setting Screening Tool***

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Members who receive services through Adult Mental Health and Habilitation (AMHH) or Behavioral and Primary Healthcare Coordination (BPHC) are required to live and receive home- and community-based services (HCBS) in settings that meet federal Medicaid guidelines for HCBS. The HCBS Residential Setting Screening Tool (RSST) tool is intended to help members and providers identify the type of setting where a member lives. Every application (initial or renewal) for BPHC or AMHH services is required to have an RSST completed in its entirety and be kept in the member's clinical record. When a member has a change in address, an RSST must also be completed within 15 calendar days of staff becoming aware of the change in the member's living situation. An updated copy of this screening tool, along with the member's and staff's signature must be kept in the member's clinical record.

When an individual changes address, providers are required to submit an updated RSST to the Indiana Family and Social Services Administration (FSSA) Division of Mental Health and Addiction (DMHA) within 15 days. A copy of the updated RSST should also be updated and maintained in the client's medical record. In addition, the *Non-Community Mental Health Center (CMHC) provider owned, controlled or operated (POCO)* residential type POCO residences other than CMHCs was added to the updated RSST to reflect the change made in the Data Assessment Registry Mental Health and Addiction (DARMHA) application.

### **RSST Information and Definitions**

The following sections provide general instructions, definitions of terms used in the tool and additional information for members and provider staff completing the tool. Specific instructions and directions are located within each section of the RSST.

#### ***General Information and Instructions***

The RSST removes the requirement for providers to independently assess the HCBS compliance of residential settings (other than private/independent homes). Because HCBS compliance information has already been reported for all currently identified CMHC POCO residential settings and will begin to be collected for identified non-POCO residential settings, it is no longer necessary for providers to "reassess" these settings every six months. The RSST has been redesigned to ensure that providers are able to accurately identify and report (via the DARMHA application) the *type* of residential setting in which an AMHH or BPHC applicant lives.

The RSST is used in conjunction with the *Non-POCO Residential Setting Worksheet* and the *Non-CMHC POCO Residential Setting Worksheet*. Non-POCO residential settings such as unlicensed assisted-living facilities must be assessed using this packet, to ensure that they also meet HCBS requirements for residential settings not owned, controlled or operated by a CMHC. The non-CMHC POCO residential settings can also be assisted-living settings but that are under the authority of the Office of Medicaid Policy and Planning (OMPP) and/or the Division of Disability and Rehabilitative Services (DDRS). **If, during completion of the RSST, an agency determines that the applicant lives in one of these settings and the setting has not been assessed for HCBS compliance, the assessment must be completed within 30 days from the date the DARMHA application was submitted.** Note that non-POCO and non-CMHC POCO residential settings need to be assessed only one time. They do not need to be reassessed unless a significant change or modification to the setting occurs, which impacts its HCBS compliance status.

Although residential settings are only required to be assessed once for HCBS compliance (barring any significant changes at the setting), the RSST must be completed with every member applying for AMHH or BPHC during the assessment process for every application (initial and renewal). The RSST must be completed before the DARMHA application is completed and submitted, because information from the RSST

must be included in the DARMHA application. Upon the provider agency learning of a change in a member's living situation, the RSST must be completed, signed by the member and placed in the clinical record.

The sections of the RSST are to be completed *in order*, until the member's living situation type has been accurately identified. The member's identifying information is entered, and the member and referring care coordinator proceed in order through the sections, beginning with Section 1. After the member's living situation has been accurately identified, and the member and case manager have signed in the appropriate section, the tool is complete. The type of residential setting in which the member lives as documented on the RSST is transferred to the *Current Living Situation* section of the DARMHA application for AMHH and/or BPHC for the member.

## ***Definitions of Settings***

The following sections define the terms used in the current RSST.

### **Homeless**

Homeless is defined as:

- Lacking a fixed, regular and adequate nighttime residence, and/or
- The primary nighttime residence is:
  - A supervised publicly or privately operated shelter designed to provide temporary living accommodation of three or less months, or
  - A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings (for example, on the street)

Note that this definition includes members who temporarily reside in homeless shelters.

### **Private/Independent Home**

An individual's private home (owned or leased), or a relative's home (owned or leased) where the individual resides, is considered to be a *private/independent home*. According to the Centers for Medicare & Medicaid Services (CMS), a state may presume that an individual's private home or a relative's home where an individual resides meets the home- and community-based settings requirements; however, it is still the state's responsibility to ensure that individuals living in a private home or a relative's home have opportunities for full access to the greater community.

Four characteristics must be present at a private/independent home:

- The residence is owned or leased/rented by the member or someone in the member's family for their personal use.
- The residence affords opportunities for full access to the greater community.
- The residence is not owned or operated by an agency that provides AMHH and/or BPHC service.
- The residence is not located in or on the grounds of a hospital, nursing home or other facility that provides inpatient institutional care.

### **Presumed Institutional Setting**

Some residential settings are presumed to have qualities of an institution, based on the following characteristics:

- The residence is located in a publicly or privately owned facility that also provides inpatient institutional care.
- The residence is in a building on the grounds of, or immediately adjacent to, a public institution.

- The residence has the effect of isolating individuals receiving AMHH services from the broader community.

### **CMHC Provider Owned, Controlled or Operated (POCO) Residential Setting**

A *CMHC POCO residential setting* is a specific physical place where a member lives that is owned, leased or co-leased by a CMHC provider of HCBS. Examples of CMHC POCO residential settings are as follows:

- Supervised group living facilities
- Transitional residential services facilities
- Semi-independent living program facilities defined under *Indiana Code IC 12-22-2-3*
- Alternative family homes operated solely by resident householders

### **Non-POCO Residential Setting**

The DMHA uses the term *non-POCO residential setting* to refer to a setting owned, controlled or operated by either a not-for-profit organization or an independent setting operating authority rather than a CMHC. Examples of these types of residential settings include but are not limited to the following:

- Residential care facilities (RCFs); this category includes unlicensed assisted living facilities (ALFs) and adult family care homes (AFCHs)
- County homes
- Cluster homes or cluster apartments owned by nonprofit agencies
- Sober living environments

### **Non-CMHC POCO Residential Setting**

A *non-CMHC POCO residential setting* is a specific physical place where a member lives that is owned, leased, or co-leased by a provider of HCBS *other than a CMHC*. However, these may be considered POCO residential settings under the authority of other FSSA Divisions.

The Indiana FSSA OMPP and the DDRS administer five other Medicaid HCBS programs, known as 1915(c) Home- and Community-Based Services (HCBS) Waivers:

- Community Integration and Habilitation (CIH) Waiver, administered by the DDRS
- Family Supports Waiver (FSW), administered by the DDRS
- Health and Wellness (H&W) Waiver, administered by the DDRS
- Indiana PathWays for Aging (PathWays) Waiver
- Traumatic Brain Injury (TBI) Waiver, administered by the DDRS

A member receiving services under any of these 1915(c) waivers also must live in a setting that is HCBS compliant.

The following figures show the two pages of the current HCBS RSST (as of July 1, 2024).

Figure 5 – HCBS RSST (Page 1)

<b>HCBS Residential Setting Screening Tool</b> <i>Effective July 1, 2024</i>											
<p>Members who receive services through the AMHH and/or BPHC program are required to live and receive HCBS services in settings that meet federal Medicaid guidelines for home and community-based services (HCBS). This tool is required to be completed (1) with <b>every member</b> applying for AMHH and/or BPHC during the development process for <b>every application</b> (initial, renewal, and modification), <b>AND/OR</b> (2) within 15 calendar days of <b>any</b> change in the member's living situation. A completed copy of this screening, with the member's and case manager's signatures in the appropriate section, must be kept with the member's clinical record. In addition, the "Current Living Situation" section on the DARMHA application should reflect the setting identified below.</p>											
<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border-bottom: 1px solid black;">Member Name: _____</td> <td style="width: 50%; border-bottom: 1px solid black;">Date of Screening: _____</td> </tr> <tr> <td colspan="2" style="border-bottom: 1px solid black;">Member's address: _____</td> </tr> <tr> <td style="border-bottom: 1px solid black;">DARMHA ID #: _____</td> <td style="border-bottom: 1px solid black;">Internal ID #: _____</td> </tr> <tr> <td colspan="2" style="border-bottom: 1px solid black;">Benefit: AMHH/BPHC (circle one or both)</td> </tr> </table>				Member Name: _____	Date of Screening: _____	Member's address: _____		DARMHA ID #: _____	Internal ID #: _____	Benefit: AMHH/BPHC (circle one or both)	
Member Name: _____	Date of Screening: _____										
Member's address: _____											
DARMHA ID #: _____	Internal ID #: _____										
Benefit: AMHH/BPHC (circle one or both)											
<p>Please check the box that best described the member's living situation:</p>											
<input type="checkbox"/>	<p><b><u>Identification for Homelessness</u></b>  Homeless is defined as: (1) lacking a fixed, regular, and adequate nighttime residence, and/or (2) the primary nighttime residence is: (a) a supervised publicly or privately operated shelter designed to provide temporary living accommodation of 3 or less months, or (b) a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings (e.g., on the street, tent community?).</p>										
<input type="checkbox"/>	<p><b><u>Identification for "Private/Independent Home" Setting</u></b>  An individual's private home (owned or leased), or a relative's home where the individual resides (owned or leased).</p>										
<input type="checkbox"/>	<p><b><u>Identification of a CMHC Provider Owned, Controlled, or Operated (POCO) Residential Setting</u></b>  A provider CMHC owned, controlled, or operated (POCO) residential setting is a specific physical place that is owned, co-owned, and/or operated by a CMHC provider of HCBS.</p>										
<input type="checkbox"/>	<p><b><u>Identification and Attestation for Non-POCO Residential Setting</u></b>  These are most often residential settings that provide some level of daily living support services, such as (<i>this list is not all-inclusive</i>):</p> <ul style="list-style-type: none"> <li>Residential Care Facilities County homes</li> <li>Residential Care Assistance Program (RCAP) facilities</li> <li>Room and Board Assistance (RBA) facilities</li> <li>Cluster homes/cluster apartments owned by non-profit agencies</li> </ul>										
<input type="checkbox"/>	<p><b><u>Identification and Attestation for Non-CMHC POCO Residential Setting</u></b>  A provider of HCBS other than a CMHC may operate or be delivering services at that setting. The Indiana FSSA agencies Division of Aging (DA) and Division of Disability and Rehabilitative Services (DDRS) administer four other Medicaid HCBS programs, known as 1915(c) Home and Community-Based Waivers:</p> <ul style="list-style-type: none"> <li>Traumatic Brain Injury (TBI; administered by DDRS)</li> <li>Health and Wellness waiver (administered by DDRS)</li> <li>Indiana Pathways for Aging (administered by OMPP)</li> <li>Community Integration and Habilitation (CIH; administered by DDRS)</li> <li>Family Supports (FS; administered by DDRS)</li> </ul>										
<b>Member Signature</b>		<b>Date</b>									
<b>Member name (printed)</b>		<b>Case Manager Signature</b>									
<b>Case Manager name (printed)</b>		<b>Date</b>									
<p>***Individuals that reside in a private/independent home, please skip the questions below***</p>											



Figure 6 – HCBS RSST (Page 2)

**RSST Ongoing Monitoring Plan**

Member Name: \_\_\_\_\_ Date of Screening: \_\_\_\_\_

Member's address: \_\_\_\_\_

DARMHA ID #: \_\_\_\_\_ Internal ID #: \_\_\_\_\_ Benefit: AMHH/BPHC (circle one or both)

For ONLY those members that reside in a POCO or non-POCO residential setting, please answer the following questions. If any responses to the following questions are "No," please email this RSST (2<sup>nd</sup> page) to [bphc.services@fssa.in.gov](mailto:bphc.services@fssa.in.gov).

1. The setting is integrated in, and supports residents' full access to, the greater community	
2. The setting is selected by the individual from among setting options	
3. Ensures an individual's rights of privacy, dignity and respect, and freedom from coercion and restraint	
4. Enhances individual initiative, autonomy, and independence in making life choices	
5. Individuals have a choice regarding services and supports, and who provides them	
6. A lease or residency agreement is in place for each HCBS participant and includes protections that address eviction processes and appeals comparable to those provided under the jurisdiction's landlord tenant law	
7. Each individual has privacy in their sleeping or living unit	
8. Individuals have the freedom and support to control their own schedules and activities, and have access to food at any time	
9. Individuals are able to have visitors of their choosing at any time	
10. The setting is physically accessible to the individual	

**By our signatures, we attest that the member's current living situation is selected correctly and the member answered the exploratory questions (when appropriate).**

\_\_\_\_\_  
Member Signature

\_\_\_\_\_  
Member name (printed)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Case Manager name (printed)

\_\_\_\_\_  
Case Manager Signature

\_\_\_\_\_  
Date