Blue Cross Blue Shield Blue Care Network of Michigan
Nonprofit corporations and independent licensees of the Blue Cross and Blue Shield Association

Provider alert
Blue Cross commercial and BCN commercial
Categories: Administrative, Billing/claims/coding
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We want to clarify the changes coming to incident-to billing for students, limited licensed clinicians

As we communicated in the June 2026 issue of *The Record*, changes are coming to our professional incident-to reimbursement policy.

- For dates of services starting March 1, 2027, students, trainees and limited licensed providers may continue to bill services incident-to a supervising provider so long as the services rendered are within a Blue Cross Blue Shield of Michigan approved **facility-based setting**, such as an outpatient psychiatric care facility.
- Allowing students, trainees and limited licensed providers to deliver services in an approved facility-based setting supports clinical oversight and promotes high-quality care.

Which limited licensed provider types are affected by this change?

This change affects the following limited licensed provider types who deliver services to Blue Cross commercial members incident-to a physician or non-physician in a professional setting:

- Limited licensed social workers
- Limited licensed professional counselors
- Limited licensed marriage and family therapists
- Temporary limited licensed psychologists

Note: This change doesn't affect limited licensed psychologists who are eligible to enroll with and bill Blue Cross directly.

How can limited licensed providers prepare for this change?

To limit disruption to reimbursement, the provider types listed above should join a Blue Cross approved facility, like an OPC, a hospital, or a community mental health facility, by Feb. 28, 2027. Starting March 1, these provider types may continue to deliver services to Blue Cross commercial members incident-to a supervising provider so long as the services are rendered in a facility.

With this change, how will students be able to get the hours they need?

Students (and trainees) can continue to deliver services to Blue Cross commercial members under the supervision of a licensed provider so long as the services are rendered in a Blue Cross approved facility.

Starting March 1, can providers with a limited license still practice in a group or private clinic?

Under our incident-to policy, starting March 1, limited licensed providers aren't eligible for reimbursement for incident-to billing in a professional setting.

Note: This doesn't apply to limited licensed psychologists, who are eligible to enroll with and bill Blue Cross directly.

How can a practice enroll with Blue Cross as an OPC?

For information about enrolling with Blue Cross as an OPC, see the following documents on **bcbsm.com**:

- Professional group practice, outpatient psychiatric care facility: Provider type comparison
- Clinical program requirements for OPCs
- Enrollment helpful hints for OPCs

To enroll with Blue Cross, go to the Join Our Provider Network webpage at **bcbsm.com**.

Additional information

For more information about incident-to billing, refer to our reimbursement policy and related frequently asked questions document. To access these:

1. Within our payer space, click on the *Resources* tab and then click on *Secure Provider Resources (Blue Cross and BCN)*. (Learn how to access our provider portal payer space.)
2. Under the *Billing and Claims* tab, click on *Medical and Reimbursement Policies* from the drop-down menu, and then choose *Blue Cross and BCN Reimbursement Policies*.

We'll continue to add information to the FAQ leading up to March 1.

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