

GEN IC #99 – CMS 0938-1148 Crosswalk of Changes

2026 Template Prior to Comment	2026 Template Changes after Comment	Type of Change	Reason for Change	Burden Change
CCBHC Assurances	CCBHC Mandatory Assurances – added “Mandatory”	Rev	Clarifies mandatory assurances and services versus optional CCBHC services states may provide in addition to the mandatory services – internal revision.	No
Checkbox: “The state has a process to ensure that CCBHC organizations will meet the most recent version of the CCBHC Certification Criteria...”	Checkbox: “The state has a reasonable process to ensure that CCBHC organizations will meet the most recent version of the CCBHC Certification Criteria...”	Rev	Adds “reasonable” in response to comments received to emphasize state consideration for providers who will need to make changes when updates are made to the criteria.	No
No content	New Checkbox and Text Box added: Optional CCBHC Services checkbox and descriptive text box	Rev	Adds a new checkbox and text box for states to add information about optional services they may elect to provide through this benefit based on comments received.	No
No content	New Checkbox and Text Box added: Coverage Limitation checkbox and descriptive text box	Rev	Adds a new checkbox and text box for states to add information about coverage limitations – internal revision in consideration for a dedicated space rather than using the existing general additional information box.	No