

PUBLIC SUBMISSION

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(CMS-10398 #99) Medicaid CCBHC Services SPA Template

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General Comment

CMS, the ONC, SAMHSA and the NLM should accelerate behavioral health information from ongoing reporting to real time reporting, such as FHIR APIs and FHIR terminology services, of the provision of services. CCBHCs will need to upgrade their interoperability infrastructure to align with the states and delegated entities. The remaining states and territories which have not upgraded its interoperability infrastructure (such as FHIR APIs and FHIR terminology services) will have issues with the operationalization of behavioral health reporting for CCBHCs.