

IHCP *bulletin*

INDIANA HEALTH COVERAGE PROGRAMS BT202674 MAY 14, 2026

FSSA clarifies Behavioral Support Services for FS and CIH waivers

The Family and Social Services Administration (FSSA) is clarifying the utilization limits in the delivery of Behavioral Support Services (BSS) available on the Medicaid Home- and Community-Based Services (HCBS) Family Supports (FS) and Community Integration and Habilitation (CIH) waivers based upon feedback received from stakeholders.



Behavioral Support Services comprise three unique direct service components, which include consultation, functional behavioral assessment (FBA) and comprehensive. The current prior authorization period is three months.

Behavioral Support Services providers must adhere to the following limitations and guidelines:

- The totality of the direct service components (consultation, FBA and comprehensive) may not exceed 144 hours during the individual's plan year.
- Only one direct service component will be authorized and may be delivered within a given month.
- Consultation may not exceed three hours a month.
- FBA may not exceed 20 hours over two concurrent months. The FBA may be completed in a shorter period of time, when appropriate.
- Comprehensive is limited to an average of 12 hours a month, and providers must ensure that when exceeding 12 hours a month that it is based upon the person's needs and that the totality of the direct service components within a plan year does not exceed 144 hours.
- When unused comprehensive hours exist within the quarterly prior authorization, those hours may roll over to subsequent months when the individual has an identified need for the additional hours. Behavioral Support Services providers must communicate in a timely manner with the case manager when this is needed to ensure that the service plan is updated and claims can be billed and paid based upon the updated service plan.
- Case managers and service providers must ensure accurate and timely updates to the individual's person-centered individualized support plan (PCISP). Accurate utilization must be documented and included in the quarterly report.
- Clinical supervision as the indirect component remains with a limit of one hour a month with an annual prior authorization.

The FBA is a direct service used to complete a comprehensive assessment resulting in a summary report that identifies both interfering and desired behaviors, hypothesized causal factors and recommendations for appropriate Behavioral Support Services support if needed.

The FBA report will act as a foundational summary using a bio-psycho-social perspective and will include a historical account of development, trauma and placement history. The FBA tells the individual's story of lived experience to better understand their current behavioral function and how to achieve their good life.

The team will review and update the behavioral support plan (BSP) document no less than annually. At the time of the annual review, life changes and minor updates can be reflected in the FBA SUMMARY STATEMENT section of the BSP template.

While it is acceptable to create an annual statement as an addendum or a running narrative with the FBA document, the FBA service is intended to be set aside as the foundational process and is not repeated every year.

For additional information, please refer to the **Quality Guide for Behavioral Support Services**, which can be found in the [BDS Portal](#) under the Resources tab.

Please reach out to bds.help@fssa.in.gov for any questions.



QUESTIONS

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