



The proposed BCBSM incident-to policy change, measured

A statewide survey of Michigan's behavioral health workforce and the people it serves, conducted June 17–30, 2026 by MMHCA, NASW-Michigan and MPA.

689 Limited licensed providers	1,856 Fully licensed & practice owners	224 Clients	4,634 Written responses	2,769 Total respondents statewide
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WHAT WE ARE ASKING

We are not requesting a delay or further study. We are asking Blue Cross Blue Shield of Michigan to keep the current framework as the permanent policy for limited licensed clinicians in professional settings, and to open a direct credentialing pathway for them.

FIVE HEADLINE FINDINGS

- 01 Thousands of clients face immediate disruption**
Respondents represent more than 5,700 BCBSM clients seen weekly by limited licensed providers. Over 1,000 are in active crisis stabilization or safety planning.
 - 02 73% of clients would go without care**
Only 3 of 224 client respondents said they could afford out-of-pocket care without financial difficulty.
 - 03 The workforce pipeline faces structural disruption**
68% of limited licensed respondents will not hold full licensure by March 1, 2027. 41% of practices have already paused limited licensed hiring.
 - 04 Private practices cannot absorb the displaced clients**
89% of fully licensed respondents report they could not take on additional clients. Responding practices estimate their fully licensed staff could absorb roughly 1 in 5 of the affected clients.
 - 05 The impact is likely understated**
The surveys reached current LARA licensees only. More than 2,500 newly licensed limited licensed counselors from last year's cohort appear nowhere in these figures.
- **Two dates**
September 1, 2026: incident-to claims must carry the SA modifier. **March 1, 2027:** limited licensed clinicians lose incident-to eligibility in professional practice settings.

Method. Three parallel surveys, June 17–30, 2026, sent by email to approximately 48,000 licensed Michigan behavioral health professionals across four association lists, and to clients through their providers. Participation was voluntary, so these are the experiences of those who chose to respond, not a random sample. That three independently surveyed populations converged is itself a finding.

Full report and action tools

mmhcanow.org/bcbsm-impact

MMHCA, NASW-Michigan & MPA. *Statewide Policy Impact Assessment: Proposed BCBSM Incident-to Billing Policy Changes.* July 28, 2026.