

## Behavioral Health in the RHC

In a previous life (so it seems since it was forty years ago), I was the founding Executive Director of a Youth and Family Counseling non-profit organization, and carried an active caseload of forty clients as well. With this background, I value the provision of behavioral health services in the RHC. Community members may recognize the car or bicycle sitting in the RHC parking lot, but no one will know if the patient is there for their physical or mental health needs, thus greatly reducing the stigma that can be attached to seeking help with emotional/behavioral issues.

However, (there's always a however isn't there?), while you can be reimbursed by Medicare and Medicaid for behavioral health services provided by a LCSW (Licensed clinical social worker--not just a MSW), or a PhD clinical psychologist, neither the licensed marriage and family therapist (LMFT) nor the licensed addiction counselor (or substance abuse counselor) is considered a reimbursable provider in the RHC. This limits your ability to find and pay for a qualified counselor in your clinic.

So, those services that are not provided by a LCSW or Clinical Psychologist would not be billable to Medicare or Medicaid, unless your state Medicaid plan has some other type of payment methodology or program available for that service.

Some states have a special Family Planning program that pays specifically for family planning services that may not be covered by Medicaid in the RHC setting, so I suppose its possible some states might have a similar program or payment methodology available for substance abuse/addiction or other counseling services.

This could get confusing for cost report preparation due to the re-classification requirements for costs associated with non-RHC services. You should consult your cost report preparer for more information on how to handle those costs associated with this service.

I firmly believe that an RHC owned and operated by a less than fifty-bed hospital that has an encounter rate above \$120, SHOULD offer behavioral health services by a LCSW. One challenge, of course, will be finding a qualified provider willing to come to your clinic a day or two per week. This type of RHC can usually afford to pay the behavioral therapist their rate per encounter and still have a margin left over for operating costs.

Don't overlook this important service that will be a valuable addition to your clinic's scope of practice.

**Jim Estes, President/Consultant**

Horizon Services, Inc.

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