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HEALTH AFFAIRS

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TRICARE
MANAGEMENT
ACTIVITY

FEB - 8 2013

Mr. Richard Yep, CAE, FASAE
Executive Director and CEO
American Counseling Association
5999 Stevenson Avenue
Alexandria, VA 22304

Dear Mr. Yep:

Thank you for your letter of October 24, 2012, to the Director, TRICARE Management Activity (TMA). You are seeking additional clarification from TRICARE regarding the requirements for mental health counselors to be certified for independent practice as published in the Interim Final Rule (IFR) regarding "TRICARE Certified Mental Health Counselors (CMHC)." We appreciate your request on behalf of the members of the American Counseling Association (ACA) and are happy to respond; please accept this response in my capacity as the Assistant Deputy Director, TMA.

First, you are seeking clarification regarding the ability of CMHCs who meet the education and examination requirements for independent practice, as outlined in Title 32, Code of Federal Regulations, Section 199.6(c)(3)(iii)(N)(2), to continue to practice as TRICARE CMHCs after December 31, 2014. You are correct in your interpretation of the IFR. Mental health counselors who become certified as a TRICARE CMHC under the transition period requirements will continue to be recognized as TRICARE-authorized providers from that point forward, including after the transition period ends. This would include 1) those state licensed mental health counselors who possess a master's or higher-level degree from a regionally accredited institution's program of mental health counseling, have passed the National Clinical Mental Health Counseling Examination, and meet the supervised clinical practice hour requirement, as well as 2) state licensed mental health counselors who possess a master's or higher-level degree from a program accredited by the Council on Accreditation of Counseling and Related Educational Programs, have passed the National Counselor Examination, and meet the supervised clinical practice hour requirement. Additionally, while these certification requirements must be completed prior to January 1, 2015, the IFR permits an applicant to become a CMHC after the transition period if all of the certification requirements were completed before the end of the transition period.

Currently, TRICARE beneficiaries are able to choose the services of either CMHCs or supervised mental health counselors (SMHCs). Both provider categories serve beneficiaries in affiliation with the managed care support contractor networks or in a non-network capacity. The SMHCs provide counseling and non-medical therapies to TRICARE beneficiaries who are diagnosed and referred by a physician. In contrast to the CMHCs, the broader criteria for authorization as a SMHC include a master's degree in mental health counseling or an allied

mental health field from a regionally accredited institution. TRICARE recognizes the breadth of expertise in the specialty areas of counseling represented by the SMHCs and appreciates those who are sustaining continuity of care for our beneficiaries during the transition period.

We apologize for any confusion and appreciate you bringing this issue to our attention. We have discussed this issue with the TRICARE Regional Offices to ensure accurate implementation of the IFR by the Managed Care Support Contractors who interface with applicants. We hope you will continue to communicate these types of issues to us for the benefit of your members and our beneficiaries.

The remaining issues raised in your correspondence must be addressed through the formal rulemaking process as the transition period date and requirements for supervised clinical practice discussed in your letter are outlined in federal regulation. We appreciated receiving the cogent remarks of the ACA during the public comment period for the IFR. Specifically, the ACA has requested the Department extend the transition period to accommodate counselors who will have graduated from a regionally accredited institution's program of mental health counseling but will not be able to complete the minimum 2 years of supervised mental health counseling practice before January 1, 2015. You have also requested changes to the requirements for supervised clinical practice to accommodate supervision by a broader range of professional providers. The Department of Defense is reviewing the input received on these and other issues during the public comment period for the IFR prior to publication of the Final Rule. In general, the public comments underscore the importance of balancing quality objectives with the preservation of a robust mental health counselor provider pool in order to ensure continued access to quality mental health services for our beneficiaries. The Department will respond to these comments as part of the formal rulemaking process. TMA will announce additional policy changes, if any, through our communications department when they become effective.

Thank you for your interest in the Military Health System and its beneficiaries. We at TRICARE are proud to serve our Nation's military heroes and their families and are committed to providing them the best possible health care.

Sincerely,



Mary Kay Justis
Assistant Deputy Director