



**CABINET FOR HEALTH AND FAMILY SERVICES
DEPARTMENT FOR MEDICAID SERVICES**

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Audrey Tayse Haynes
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MEMORANDUM

TO: MCO, Behavioral Health Area

FROM: Kristina Hayden, M.Ed., LPCA
Commissioner's Office

RE: Clarification of Behavioral Health Services Provider

- Linking of Physicians to Behavioral Health Service Organizations (BHSOs)

Based on conversations between providers and the Department for Medicaid Services (DMS), it has recently come to our attention that behavioral health and substance use providers have been informed that physicians must have a psychiatric specialty in order to link to a BHSO. Additionally, providers have stated they were informed that only psychiatrists can perform substance use services. DMS would like to provide your organization with policy clarification regarding these issues.

None of DMS' behavioral health and substance use regulations prohibit any licensed physician or APRN from linking to a BHSO or providing these services. Currently, the traditional Medicaid program is linking physicians and APRNs without the psychiatry specialty to BHSOs and are reimbursing medically necessary services per the DMS published fee schedules. Restricting physician to the psychiatric specialty creates barriers to providing Medicaid members needed services. DMS expects all providers to practice within their scope of licensure and requires all services to be medically necessary and meet the definitions as contained in Kentucky Medicaid regulations and applicable coding guidelines.

Should you have any questions or require additional information, you may contact me. My email address is Kristina.Hayden@ky.gov and my phone number is (502) 564-4321 ext. 2001.