



2024 Medicare Reimbursement Options for Licensed Counselors and Marriage and Family Therapists



Who can now provide behavioral health services under Medicare?

- Licensed marriage and family therapists, mental health counselors, licensed professional counselors, and addictions counselors (who have a masters or doctorate degree in counseling or a related field, two years of supervised experience and a national licensing exam) can begin providing behavioral health services to Medicare beneficiaries starting Jan. 1, 2024.

| [Medicare-Coalition-Packet-5-17-18-002-1.pdf \(centerstone.org\)](#)

| <https://www.cms.gov/blog/important-new-changes-improve-access-behavioral-health-medicare>

- New providers will need to register to become Medicare Part B providers and get their own National Provider Identifier to bill independently.

| <https://www.cms.gov/blog/important-new-changes-improve-access-behavioral-health-medicare>

| <https://www.nbcc.org/govtaffairs/medicarevideos>

- Providers can apply for Medicare enrollment immediately, but cannot bill for services until Jan.1, 2024.

| <https://www.nb5cc.org/govtaffairs/medicarevideos>



How will the new services be billed?

- Licensed counselors will be able to bill Medicare directly for covered behavioral health services for beneficiaries. They will be reimbursed 80% of the lesser of actual charge for services or 75% of the amount for a psychologist (and this is on par with licensed clinical social worker)

| <https://www.nbcc.org/govtaffairs/medicarefactsheets>

- Global billing (which pays for facilities, insurance, etc. covered under relative value units in practice expense column) and professional billing (biller working in another's office) will be allowed. This allows for facility fee and non-facility fee-based reimbursement. The rule would allow for telehealth services provided to members in their homes to be paid permanently at the higher non-facility physician fee schedule rate.

| [CMS Proposes Changes to Medicare Telehealth Policies, Including Increased Payment Rates |](#)

[Covington & Burling LLP](#)





How can this be implemented?

- Licensed Counselors will be eligible Part B providers in Federally Qualified Health Centers, Rural Health Clinics, as required in hospice interdisciplinary teams, Medicare Integrated Behavioral Health and Primary Care Programs. The providers will be allowed to participate in behavioral health integration projects, primary care and accountable care organizations' coordinated care programs.
| <https://www.nbcc.org/govtaffairs/medicarefactsheets>
- Licensed counselors will be able to order diagnostic tests, per their state licensure, laws and rules, if they relate to the service for which they are providing, and if the test is Medicare approved.
| <https://www.nbcc.org/govtaffairs/medicarevideos>
- At federally qualified health centers and rural health clinics, behavioral health counselors will be able to provide services without a physician practitioner on site.



How can referrals occur?

- Beneficiaries can be referred for behavioral health telehealth services even if they have not had a previous in-person visit within the previous six months. This requirement has been waived until 2025.
| <https://www.nbcc.org/govtaffairs/medicarevideos>
- Licensed counselors will be able to bill for Health Behavior Assessment and Intervention Services for Behavioral Health Integration. This includes psychological assessment and treatment when the primary diagnosis is a medical condition, which can facilitate the behavioral health referral process.
| [Calendar Year \(CY\) 2024 Medicare Physician Fee Schedule Proposed Rule | CMS](#)



For more information

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