

## Chapter 11

## Section 3.11

# Mental Health Counselor

Issue Date: February 24, 1988

Authority: [32 CFR 199.6\(c\)\(3\)\(iii\)\(N\)](#) and [\(c\)\(3\)\(iv\)\(C\)](#)

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### 1.0 BACKGROUND

The National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2016, Section 716, was signed into law on November 25, 2015. The Act establishes a transition period during which the entities that accredit education for authorizing TRICARE Certified Mental Health Counselors (TCMHCs) are expanded. These entities will be used when determining eligibility for reimbursement of services provided by TCMHCs under the TRICARE Program from November 25, 2015 through December 31, 2020. This transition period ends on January 1, 2021.

### 2.0 POLICY

#### 2.1 TRICARE Certified Mental Health Counselor (TCMHC)

For the purposes of TRICARE, a TCMHC is an independent provider who does not require referral and oversight by a physician in order to receive reimbursement for service to a beneficiary. A TCMHC must be licensed for independent practice in mental health counseling by the jurisdiction where practicing. In jurisdictions with two or more licenses allowing for differing scopes of independent practice, the licensed mental health counselor may only practice within the scope of licensure he or she possesses. In addition, a TCMHC is an individual who:

**2.1.1** Meets all of the requirements identified in [paragraphs 2.1.1.1](#) through [2.1.1.3](#):

**2.1.1.1** Has passed the National Clinical Mental Health Counselor Examination (NCMHCE) or an examination determined by the Director, [Defense Health Agency \(DHA\)](#) as equal in scope, intent, and content to the NCMHCE; and

**2.1.1.2** Possesses a master's or higher-level degree from a mental health counseling program of education and training accredited for Mental Health Counseling or Clinical Mental Health Counseling by the Council for Accreditation of Counseling and Related Educational Programs (CACREP); **OR otherwise meets the requirements contained in [paragraph 2.1.3](#)**; and

**2.1.1.3** Has a minimum of two years of post-master's degree supervised mental health counseling practice that includes a minimum of 3,000 hours of supervised clinical practice and 100 hours of face-to-face supervision. This supervision must be provided by mental health counselors, psychiatrists, clinical psychologists, [Certified Clinical Social Workers \(CCSWs\)](#), TCMHCs, or [Certified Psychiatric Nurse Specialists \(CPNSs\)](#) who are licensed for independent practice in the jurisdiction where practicing and must be practicing within the scope of their licenses. Supervision must be

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conducted in a manner that is consistent with the guidelines regarding knowledge, skills, and practice standards for supervision of the American Mental Health Counselors Association (AMHCA).

OR

**2.1.2** Has met the requirements identified in paragraphs 2.1.2.1 or 2.1.2.2, plus 2.1.2.3, at any point prior to January 1, 2017:

**2.1.2.1** Possesses a master's or higher-level degree from a mental health counseling program of education and training accredited for Mental Health Counseling or Clinical Mental Health Counseling by CACREP (OR otherwise meets the requirements contained in paragraph 2.1.3) and has passed the National Counselor Examination (NCE) or NCMHCE; or

**2.1.2.2** Possesses a master's or higher-level degree from a mental health counseling program of education and training accredited for Mental Health Counseling or Clinical Mental Health Counseling from an educational institution accredited by a Regional Accrediting Organization recognized by the Council for Higher Education Accreditation and has passed the NCMHCE; and

**2.1.2.3** Has a minimum of two years of post-master's degree supervised mental health counseling practice that includes a minimum of 3,000 hours of supervised clinical practice and 100 hours of face-to-face supervision. This supervision must be provided by mental health counselors, psychiatrists, clinical psychologists, CCSWs, TCMHCs, or CPNSs who are licensed for independent practice in the jurisdiction where practicing and that is consistent with the guidelines regarding knowledge, skills, and practice standards for supervision of the AMHCA.

**2.1.3** Pursuant to Section 716 of the NDAA for FY 2016, prior to January 1, 2021, an individual satisfies the requirement to "hold a master's or higher-level degree from a mental health counseling program of education and training accredited for Mental Health Counseling or Clinical Mental Health Counseling by CACREP" if the individual holds a master's degree or doctoral degree in counseling from a program that is accredited by any of the following:

- Accrediting Commission for Community and Junior Colleges Western, Association of Schools and Colleges (ACCJC-WASC)
- Higher Learning Commission (HLC)
- Middle States Commission on Higher Education (MSCHE)
- New England Association of Schools and Colleges Commission on Institutions of Higher Education (NEASC-CIHE)
- Southern Association of Colleges and Schools (SACS) Commission on Colleges
- WASC Senior College and University Commission (WASC-SCUC)
- Accrediting Bureau of Health Education Schools (ABHES)
- Accrediting Commission of Career Schools and Colleges (ACCSC)

- Accrediting Council for Independent Colleges and Schools (ACICS)
- Distance Education Accreditation Commission (DEAC)

## 2.2 Supervised Mental Health Counselor (SMHC)

For purposes of TRICARE, an SMHC is an individual who does not meet the requirements of a certified mental health counselor, but meets the requirements identified in paragraphs 2.2.1 through 2.2.3 and abides by the conditions of reimbursement identified in paragraph 2.2.4. **The SMHC:**

**2.2.1** Possesses a minimum of a master's degree in mental health counseling or allied mental health field from a regionally accredited institution; and

**2.2.2** Has two years of post-master's experience which includes 3,000 hours of clinical work and 100 hours of face-to-face supervision; and

**2.2.3** Is licensed or certified to practice as a mental health counselor by the jurisdiction where practicing; and

**2.2.4** **The SMHC shall be reimbursed when the following criteria are met:**

**2.2.4.1** The TRICARE beneficiary is referred for therapy by a physician; and

**2.2.4.2** A physician is providing ongoing oversight and supervision of the therapy being provided; and

**2.2.4.3** The **SMHC** certifies on each claim for reimbursement that written communication has been made or will be made to the referring physician of the results of the treatment. Such communication will be made at the end of the treatment, or more frequently, as required by the referring physician.

**2.2.4.4** **A Licensed Psychological Associate (LPA) can continue to practice as an SMHC upon meeting all requirements under 32 CFR 199.6(c)(3)(iv)(C). The eligibility requirements for SMHCs did not change with the publication of the Final Rule: "TRICARE; Certified Mental Health Counselors" (76 FR 80741), effective August 18, 2014. These requirements include licensure or certification in the provision of mental health counseling (e.g., LPA; Licensed Professional Counselor (LPC)) by the jurisdiction where practicing, in addition to the other requirements outlined in the CFR regarding education and supervision. Providers who meet the SMHC requirements provide services to beneficiaries under physician referral and supervision.**

**2.2.4.5** The Contractor shall provide reports as described in the Contract Data Requirement List (CDRL).

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