

APPENDIX J. BEHAVIORAL HEALTH PROVIDER ANALYSIS

This study identified ineligible providers based on: (i) the definition in HITECH §3000(3); and (ii) those HITECH identified providers that could participate in the Medicare or Medicaid Programs. The definition of health care provider in HITECH does not include certain healthcare providers that are key for delivering behavioral health services. Identifying the behavioral health provider types included in the behavioral health cluster in this report was particularly challenging in large part due to the historic blurring of behavioral health providers and the services provided by these entities. This appendix identifies the behavioral health providers included in the study and describes the services these types of providers can deliver. In addition, this appendix identified those behavioral health provider types evaluated, but not included in this study.

TABLE J1. Providers Identified in HITECH and Included in This Study

Provider Type	Services Include
Psychiatric Hospital/Units including those psychiatric hospitals/units specializing in substance abuse	Diagnostic, medical treatment, and monitoring services for inpatients who suffer from mental illness. (May also include substance abuse hospitals and units that provide treatment for patients who suffer from substance abuse disorders.)
Residential Treatment Center/Facility for mental health and/or substance abuse	These establishments provide room, board, supervision, and counseling services. Although medical services may be available at these establishments, they are incidental to the counseling, mental rehabilitation, and support services offered.
Community Mental Health Center	Multi-service organization for mentally ill patients who have been discharged from inpatient treatment at a mental health facility. These facilities may also act as 24-hour emergency care facilities, screening facilities, or day treatment facilities (partial hospitalization) for mentally ill patients.
Clinical Psychologist	Psychologists assess, diagnose, and treat mental, emotional, and behavioral disorders. Psychologists may own their own practice, or be employed by hospitals, mental health institutions or long-term care facilities as part of a team care approach.
Clinical Social Worker	Clinical Social Workers provide diagnosis and case management care to individuals suffering from a variety of conditions and illnesses. They perform social care services in several in-patient and out-patient care settings, and in certain states, may operate a private practice.

TABLE J2. Providers Evaluated, but Did Not Meet Study Criteria to be Included in This Study	
Provider Type	Services Include
Substance abuse hospital/unit	Diagnostic, medical treatment and monitoring services for inpatients who suffer from substance abuse disorders.
Outpatient mental health and/or substance abuse clinic	<p>No definitive definition -- may provide multiple services, partial hospitalization.</p> <p>The Medicare program does not have an outpatient mental health or substance abuse provider type. State Medicaid programs may chose to elect to have outpatient mental health and/or substance abuse clinics as a designated Medicaid provider type. However, for purposes of this study:</p> <ul style="list-style-type: none"> - Some of the clinicians who practice in this optional category may be presently eligible for incentives (i.e., psychiatrists). - Other clinicians who practice in this clinic may be ineligible and are otherwise included in this report (i.e., clinical psychologist and social workers). <p>Given the lack of data on expenditures on health IT adoption on these clinics, this report does not include a specific focus on these clinics.</p>
Licensed Counselor	<p>Substance abuse and behavioral disorder counselors advise people who have alcoholism or other types of addiction, eating disorders, or other behavioral problems. They provide treatment and support to help the client recover from addiction or modify problem behaviors.^a</p> <p>HITECH 3000(3) does not include the health care provider type of licensed counselor. We note that Medicare and Medicaid may cover various categories of professionals considered to be licensed counselors.</p>
Psychiatric Advanced Practice Nurse	<p>Nurse practitioners (NP) or clinical nurse specialists (CNS) in psychiatric mental health nursing. States and place of service often title Advanced Practice Psychiatric Nurse (APPN) differently. For example, in New Jersey APPNs with CNS or NP credentials in psychiatric mental health nurse are titled by the state as nurse practitioners. Standardizing the titling among states and places is a goal of American Psychiatric Nurse Association. From a national perspective, little difference exists between APPN roles except that nurse practitioners may provide primary health care for patients and in all states they have prescriptive authority.</p> <p>Psychiatric advanced practice nurses are not identified in HITECH Section 3000(3). However, some psychiatric practice nurses may also be clinical nurse specialists or nurse practitioners. Clinical nurse specialists and nurse practitioners subject to volume thresholds are eligible for Medicaid EHR incentives. This study does not include a study of these providers.</p>

TABLE J2. Providers Evaluated, but Did Not Meet Study Criteria to be Included in This Study	
Provider Type	Services Include
Partial Day Treatment Center/ Hospitalization	<p>Partial hospitalization is a type of treatment program that is used to treat behavioral health conditions. An individual who is being treated in a partial hospitalization program is living at home, but commutes to treatment center up to 7 days a week. Partial hospitalization services are affiliated with a hospital and may be licensed as part of the hospital or a separate free standing program. Group therapy, individual therapy, medication management and other services are provided in the partial hospitalization setting.</p> <p>HITECH 3000(3) does not include the health care provider type of “partial day treatment center/hospitalization.” We note that Medicare covers these services.^b</p>
Opioid (Methadone) Treatment Programs	<p>One type of therapy used in the treatment of heroin or other opiate (narcotic) addiction is medication-assisted opioid therapy with medications such as methadone¹ or buprenorphine. In order for a facility to use medication-assisted opioid therapies, it must be certified as an opioid treatment program (OTP) through the Center for Substance Abuse Treatment (CSAT) within the Substance Abuse and Mental Health Services Administration (SAMHSA).</p>
<p>a. Bureau of Labor Statistics, Occupational Handbook. http://www.bls.gov/ooh/community-and-social-service/substance-abuse-and-behavioral-disorder-counselors.htm accessed November 20, 2012.</p> <p>b. See http://www.medicare.gov/coverage/partial-hospitalization-mental-health-care.html accessed November 20, 2012.</p>	

EHR PAYMENT INCENTIVES FOR PROVIDERS INELIGIBLE FOR PAYMENT INCENTIVES AND OTHER FUNDING STUDY

Files Available for This Report

- Main Report <http://aspe.hhs.gov/daltcp/reports/2013/EHRPI.shtml>
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI.pdf>
- APPENDIX A. Medicare and Medicaid EHR Incentive Programs
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPlap.shtml#appendA>
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI-appendA.pdf>
- APPENDIX B. Definitions and Certification of EHR Technology
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPlap.shtml#appendB>
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI-appendB.pdf>
- APPENDIX C. Public Health Service Act Section 3000(3) as Added by HITECH
Section 13101 -- Provider Analysis
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPlap.shtml#appendC>
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI-appendC.pdf>
- APPENDIX D. Ineligible Provider Characteristics
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPlap.shtml#appendD>
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI-appendD.pdf>
- APPENDIX E. Long-Term and Post-Acute Care Provider Profiles
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPlap.shtml#appendE>
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI-appendE.pdf>
- APPENDIX F. Behavioral Health Provider Profiles
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<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI-appendF.pdf>
- APPENDIX G. Safety Net Provider Profiles
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<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI-appendG.pdf>
- APPENDIX H. Other Health Care Provider Profiles
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPlap.shtml#appendH>
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<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI-appendI.pdf>
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- APPENDIX M. Technical Assistance Programs
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<http://aspe.hhs.gov/daltcp/reports/2013/EHRPlap.shtml#appendN>
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI-appendN.pdf>
- APPENDIX O. Anti-Kickback Statute EHR Safe Harbor Regulations
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPlap.shtml#appendO>
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI-appendO.pdf>
- APPENDIX P. Private Sector Programs to Advance Certified EHR Technology
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPlap.shtml#appendP>
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI-appendP.pdf>
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<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI-appendQ.pdf>
- APPENDIX R. Technical Advisory Group Summary
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPlap.shtml#appendR>
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI-appendR.pdf>
- APPENDIX S. Evaluating Benefits and Costs of New Incentives for EHR Adoption by Ineligible Providers
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPlap.shtml#appendS>
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI-appendS.pdf>

APPENDIX T. CIO Consortium EMR Cost Study Data

<http://aspe.hhs.gov/daltcp/reports/2013/EHRPlap.shtml#appendT>
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI-appendT.pdf>

APPENDIX U. Abbreviations and Acronyms

<http://aspe.hhs.gov/daltcp/reports/2013/EHRPlap.shtml#appendU>
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI-appendU.pdf>

APPENDIX V. References

<http://aspe.hhs.gov/daltcp/reports/2013/EHRPlap.shtml#appendV>
<http://aspe.hhs.gov/daltcp/reports/2013/EHRPI-appendV.pdf>