
FEHB Program Carrier Letter

Fee-for-Service

U.S. Office of Personnel Management
Office of Insurance Programs

Letter No. 2000- 45

Date: September 12, 2000

Fee-for-service [40]

Experience-rated HMO [--]

Community-rated HMO [--]

Subject: Coverage for Pastoral Counselors in Medically Underserved States

Effective January 1, 2001, we are requiring all Federal Employees Health Benefits (FEHB) Program fee-for service carriers to provide benefit coverage for American Association of Pastoral Counselors (AAPC) certified pastoral counselors at the fellow and diplomate level in medically underserved states.

The FEHB law, section 8902 of Chapter 89 of 5 U.S.C, requires carriers in medically underserved states to reimburse all providers for covered health services properly provided under State law, regardless of any other provisions of their contracts. This requirement applies only to State licensed providers, therefore, certified pastoral counselors traditionally have not been considered eligible for reimbursement by FEHB carriers in states where they are restricted from licensure due to regulatory statutes. As we interpret the statute, we find that although it does not require providers who are not licensed by the State to be covered, it does not preclude their coverage either.

We looked at several documents, which compare the training of AAPC certified pastoral counselors at the fellow, and diplomate level with mental health professionals such as licensed clinical social workers and have decided that AAPC counselors meet the requirements for viable providers. We have also learned that the Tricare Program administered by the Department of Defense has issued policy guidance on the status of pastoral counselors certified by the AAPC at those levels. Under the Tricare Program, in jurisdictions that do not offer licensure or certification for pastoral counselors, their services are covered when a physician refers the patient for therapy and provides ongoing oversight and supervision. We are adopting a similar policy under the FEHB Program for covered services provided in medically underserved states.

As you seek to broaden, expand, and diversify your networks to prepare for the implementation of mental health and substance abuse parity in 2001, we ask that you consider the role of certified pastoral counselors in efforts to meet the needs of FEHB members.

Sincerely,



Frank D. Titus
Assistant Director
for Insurance Programs