

KEY TAKEAWAYS – INTEGRATING BEHAVIORAL HEALTH CHECKLIST

1. Inform yourself on the scope of their practice
2. What new staff will be required?
3. Who will pay for the care
4. Will this impact their current referral system
5. Compliance Concerns – Clinics/smaller practices
 - Do they own other healthcare entities?
 - Do they own a lab?
 - Do they render services on the site of another provider?
6. Relevant laws: Stark, AKS and EKRA
7. 6. Compliance Concerns – Hospitals
 - What does the healthcare system/hospital structure currently allow?
 - Are there multiple locations in one state?
 - Are there multiple hospitals across state lines?
 - Will the needs your client has be difficult to address in the hospital set up
8. . Compliance Concerns – Private employers who offer care themselves
 - Employee consent: Is the mental health care voluntary, or mandatory (physical care is usually mandated by the employer provided healthcare provider)
 - Access/privacy: How to ensure that employees can address mental health issues without fear of gossip or employer accessing their healthcare records
 - Completeness of records: Does the employer/provider have a means to obtain or update mental health records from other providers/previous care
9. 8. Employment issues
 - Is the HR system able to interview, hire, and maintain records on mental health providers?
 - Does the practice have space to put such providers?
 - Will telehealth be used or will it be the primary means of connecting patients to the mental health care provider and does telehealth require additional aides/staff?
 - Can HR update or create access to annual CMEs and CEUs and keep records of same?
10. 9. HR Issues – Privacy and confidentiality of patient records
 - Does HR understand limits on access to mental health records?
 - 42 CFR Part 2, and will it apply?
11. General privacy/security concerns
12. Billing/Coding – Are they ready to code and bill for new services
13. Work flow and referrals internally between providers
14. Referrals. How will that work with regard to patient choice of provider