

I wanted to take a few minutes to bring you up to date on the proposed Outpatient Clinic rules - HFS 35. Some of you may have received the NASW-Wisconsin alert which seems to be more of an Alarmist piece than it needs to be. While I am not going to criticize what is written let me make it clear that there will be Clinic rules and what is proposed in HFS 35 is a vast improvement over what has been.

The new rules are much less rigid than current law. There are several points which need to be highlighted:

1. Clinics will no longer need to have a psychiatrist or psychologist in charge.
2. Supervision can be provided via Collaboration - a licensed colleague can provide necessary supervision. This will be a huge saving for most clinics.
3. You do not have to be a certified clinic to bill insurance. Only Medicare and Medicaid require certified clinics for billing.
4. Unannounced visits would really only occur if there is just cause/complaints.
5. Written referrals are common medical practice. This is protection for both clinician and consumer.
6. If a client is being discharged it is the responsibility of the clinician to make reasonable efforts to get the client connected with another therapist.

As a member of the Wisconsin Coalition of Behavioral Health Providers and Legislative chair for WMHCA I have worked for over 20 years trying to get Licensure (achieved), revision of the clinic rules, and eventually vendorship. This has been a contentious process at times with many concerns voiced and debates over what will best serve our needs, to name just a few.

Please be advised that the Joint Board of Professional Counselors, Marriage and Family Therapists and Social Workers voted 9-0 for these rules to be accepted. NASW - Wisconsin sat on the Coalition board for many years but they chose to walk out in 2007.

These rules primarily impact those working with Medicaid/Medicare. These entities are governed by Statute which supersedes rules.

It is the hope of the Coalition that the door to Vendorship is and will be opened through adoption of HFS 35.

There are many in the state that would prefer to work in a clinic setting vs. private practice. These rules accommodate both.

While I am unable to answer all of your questions I would be happy to answer as many as possible if you contact me at (414) 276-3856. I would also suggest you contact our lobbyist, Ann Jablonski (608) 251-0702.

Respectfully,

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