

Considerations for Tribal Behavioral Health Programs Operated Under P.L. 93-638: Direct Billing for Certain Services* and Operating as a Non-TRBHA or a TRBHA

*Certain Behavioral Health Services include case management, non-emergency transportation, and out-of-facility services that have not been previously billed directly.

	DIRECT Billing as a Tribal Behavioral Health 638 Program for Mentioned Services & Operating as a Non-TRBHA	DIRECT Billing as Tribal Behavioral Health 638 Program for Mentioned Services & Operating as a TRBHA
PROS:		
Total Use of 100% FFP (no State GF Impact) for Eligible Services	X	X
Behavioral Health Home or "Gatekeeper" Role	X	X
Limited to No Coordination with RBHA	X	X
TRBHA Administrative Support Funding		X
TRBHA Quality Management Technical Assistance from ADHS		X
Access to Block Grant Funding from ADHS		X
PERCEIVABLE CONS:		
Limited Control of Inpatient Placement if NOT Included in a 638 Contract	X	
Administrative Oversight & Program Reporting		X