

 Aetna Better Health® of Kentucky Aetna Better Health of Kentucky 9900 Corporate Campus Drive Suite 100 Louisville, KY 40223	Date:	November 25, 2025
	To	All Network Providers
	From	Provider Experience
	Subject	TRP – Summary of Provider Education and Reimbursement Guidelines
	Document ID	Aetna-2384

Aetna Better Health of Kentucky would like to provide the following notice to summarize education and reimbursement guidelines that have been provided to date regarding the coverage and provision of **Therapeutic Rehabilitation Program (TRP)** services. Additional updates that will be effective **1/01/2026** are also included in this notice.

Please see the below Kentucky Department of Medicaid Services billing guidance for TRP services.

Codes	Description	Units	Limits/Comments
H2019	THERAPEUTIC BEHAVIORAL HEALTH SERVICES	15 MINUTES	LIMIT OF (12) UNITS PER DAY, PER INDIVIDUAL
H2020	THERAPEUTIC BEHAVIORAL HEALTH SERVICES	PER DIEM	PER DAY, > 3 HOURS OF SERVICES PER DAY

Both (H2020) and (H2019) may not be reimbursed for the same date of service for the same recipient. More than (1) unit of H2020 is not reimbursable for the same date of service for the same recipient.

Therapeutic Rehabilitation Program Services (TRP) – H2019/H2020

(Document ID: Aetna – 1417)

- Therapeutic Rehabilitation Program (TRP) is a rehabilitative service to treat adults with SMI (Severe Mental Illness) and children with SED (Severe Emotional Disability). For those receiving TRP services, the SMI or SED would be the primary reason the recipient is seeking treatment.
- TRP is designed to maximize reduction of mental disability and restoration of the recipient's best possible functional level.
- TRP is not intended to treat individuals with a Substance Use Disorder as the primary reason for seeking treatment.
- TRP services should be designed to reduce disabilities related to social, personal, and daily living skills resulting from SMI or SED, as well as the restoration of these skills.
- Component services of TRP are delivered using a variety of psychiatric rehabilitation techniques to address SMI and SED and focus on improving daily living skills, self-monitoring of symptoms and side effects, emotional regulation skills, crisis coping skills and interpersonal skills.
- TRP services may be provided individually or in a group setting.

A note to providers about a diagnosis of SMI (Serious Mental Illness) and SED (Serious Emotional Disturbance).

- A diagnosis of SMI is more than a DSM diagnosis alone because it specifically identifies a subset of mental disorders that cause serious functional impairment. While a DSM diagnosis identifies a disorder, an SMI diagnosis also requires the additional severity of the impact on a person's functioning.
- Likewise, a diagnosis of SED requires both a designated mental illness diagnosis (per the DSM) and demonstrable functional limitations due to the disturbance, which significantly impacts a child's self-care, family, social, and self-direction activities.
- Simply having a DSM diagnosis is not enough, the functional impairment must also be present for a sustained period to meet the SMI/SED criteria.
- Kentucky's definition of Serious Mental Illness (SMI) is established through multiple Kentucky Administrative Regulations (KAR), such as 907 KAR 15:060 and 907 KAR 15:065, which refer to criteria found in KRS 210:005 and the Diagnostic and Statistical Manual of Mental Disorders (DSM). The criteria for SMI are detailed in administrative regulations related to behavioral health and eligibility for services like targeted case management, requiring a diagnosis of a mental illness that significantly impairs functioning.
- In Kentucky, the Medicaid definition of Seriously Emotionally Disturbed (SED) for children is established in the state statute **KRS 200.503(3)**. Kentucky Administrative Regulations for Medicaid, such as 907 KAR 15:060, reference this statute for eligibility for specific services.

Additional Therapeutic Rehabilitation Program Requirements

TRP should include the following.

- An individualized plan of care identifying measurable goals and objectives, including a discharge and relapse prevention plan.
- Coordination of services the individual may be receiving and referral to other necessary support services as needed.

TRP services may be provided by the following.

- An approved behavioral health practitioner, except for a Licensed Clinical Alcohol and Drug Counselor (LCADC).
- An approved behavioral health practitioner under supervision, except for a Certified Alcohol and Drug Counselor (CADC) or (LCADCA) Licensed Clinical Alcohol and Drug Counselor Associate.
- An Adult, Family, or Youth Peer Support Specialist working under the supervision of an approved behavioral health practitioner may provide TRP support services.

Therapeutic Rehabilitation Program & Peer Support Services

(Document ID: Aetna-1631)

- As TRP support services may be provided by an Adult, Family, or Youth Peer Support Specialist working under the supervision of an approved behavioral health practitioner, PSS are considered included in the TRP service and are not separately billable.
- The billing provider of the TRP service should not also bill for PSS services provided to the same member on the same date of service as this is considered duplicative.

Therapeutic Rehabilitation Program (TRP) & Comprehensive Community Support Services (CCSS)

(Document ID: Aetna-2184)

Please see the below covered service description for Therapeutic Rehabilitation Program services and Comprehensive Community Support Services per 907 KAR 15:020, 907 KAR 15:020 and 907 KAR 1:044.

Therapeutic Rehabilitation Program (H2019/H2020)	Comprehensive Community Support Services (H2015)
<ul style="list-style-type: none"> • Shall be delivered using a variety of psychiatric rehabilitation techniques focusing on: <ul style="list-style-type: none"> • Improving daily living skills. • Self-monitoring of symptoms and side effects. • Emotional regulation skills. • Crisis coping skills. • Interpersonal skills. 	<ul style="list-style-type: none"> • Consists of using a variety of psychiatric rehabilitation techniques to: <ul style="list-style-type: none"> ○ Improve daily living skills. ○ Improve self-monitoring of symptoms and side effects. ○ Improve emotional regulation skills. ○ Improve crisis coping skills. ○ Develop and enhance interpersonal skills.

- Based on the above service descriptions, the billing provider of the Therapeutic Rehabilitation Program services should not also bill for Comprehensive Community Support Services provided to the same member on the same date of service as this would be duplicative.
- Aetna Better Health of Kentucky has claims edits in place to prevent duplicative billing.

Therapeutic Rehabilitation Program (TRP) Billed on the Same Day as Psychotherapy, Other Outpatient Therapy, Other Per Diem Services

CMS generally prohibits billing multiple per diem service codes for the same individual, for the same date of service, as it often reflects duplicative billing or unbundling. Per diem (all inclusive) rates cover various services provided for a full day of care.

Per Kentucky Administrative Regulations (KAR), Individual, Group and Family Outpatient Therapy shall not exceed (3) hours per day alone or in combination with any other outpatient therapy per individual unless additional time is medically necessary.

- Per the Kentucky DMS definition of TRP per diem services (H2020), this service code indicates TRP services exceeding (3) hours per date of service, per individual.
- Per the Kentucky DMS definition of TRP per 15 minutes (H2019), (12) units of H2019 indicates TRP services rendered for (3) hours.

Effective 1/01/2026:

- Aetna Better Health of Kentucky will not reimburse for (H2020) billed on the same date of service as any psychotherapy or other outpatient therapy service.
- Aetna better Health of Kentucky will not reimburse for (H2019) if the number of units is equal to 12 units/3 hours and is billed on the same date of service as any psychotherapy or other outpatient therapy service.
- Aetna Better Health of Kentucky will not reimburse for TRP billed on the same day as any other per diem service code.

The following list of codes may not be an all-inclusive list of codes that are not billable on the same date of service as TRP. In addition, if the Department for Medicaid Services recognizes, at any point, additional outpatient therapy or per diem services codes, TPR services may not be reimbursable if billed the same day as any such additional code(s).

90832	90836	90839	90846	90853
90833	90837	90840	90847	90870
90834	90838	90845	90849	90875
90876	H0004	H0015	S9480	H0035
H0011	H2034	H2036	H0038	H2015

Claims paid for services exceeding the guidelines described throughout this notice are subject to review and/or recovery. Aetna Better Health of Kentucky may recover identified overpayments per KRS 304.17A-714.

Providers may appeal claim denials if they feel services have met criteria for medical necessity based on the individual’s clinical needs. Please refer to the Aetna Behavioral Health Provider Manual located on our provider website for specific guidance on how to file an appeal.

[For Health Care Providers | Aetna Medicaid Kentucky](#)

Applicable Regulations

- 907 KAR 15:010 coverage provisions and requirements regarding behavioral health services provided by individual behavioral health practitioners, behavioral health provider groups, and behavioral health multi-specialty groups.
- 907 KAR 15:020 coverage provisions and requirements regarding behavioral health services organizations for mental health treatment.
- 907 KAR 1:044, coverage provisions and requirements regarding community mental health center behavioral health services.
- 907 KAR 1:054 Coverage provisions and requirements regarding federally qualified health center services.
- 907 KAR 1:082 Coverage provisions and requirements regarding rural health clinic services.

Please note that all provider notices require Kentucky Department of Medicaid Services approval prior to dissemination.

Questions?

Simply contact your Network Relations Manager. Our most current listing is attached, the listing can also be found on our website.

*****INSERT NETWORK CONTACT LISTING*****