

**Title: Individual & Family Plans & Child Health Plan *Plus*:
Billing for Unlicensed Practitioners**

Policy Number: 0020 **Department:** IFP Contract
Original Date: 08/01/23 **Revision Date:** 11/29/23
Approved by: Kimberly Nordstrom, MD, JD **Title:** Chief Medical Officer
Signature: *Kimberly Nordstrom, MD, JD* **Date:** 11/29/23

1. Purpose

- 1.1. Rocky Mountain Health Plans (RMHP) Medicaid plans allow for unlicensed practitioners to bill for therapy through their supervising, licensed clinician. This policy extends the rule to include RMHP Individual & Family Plans (IFP) and Child Health Plan *Plus* (CHP+).

2. Applicability

- 2.1. This policy applies to all RMHP IFP lines of business and CHP+.

3. Policy

- 3.1. Unlicensed practitioners may bill for therapy through their licensed supervisor.
 - 3.1.1. Unlicensed practitioners must adhere to the qualifications and requirements of this policy
 - 3.1.2. Licensed supervisors must complete and submit an attestation yearly. If a supervisor completes/completed the Medicaid attestation for RMHP, another attestation does not need to be completed.

4. Qualifications

- 4.1. **Unlicensed or pre-licensed practitioners** may include the following:
 - 4.1.1. Bachelor's level staff functioning as case managers, community outreach staff, and/or peers; Master's/doctoral level interns; Master's/doctoral level pre-licensed clinicians (registered with DORA as a licensure candidate, ie Professional Counselor Candidate (LPCC), Licensed Social Worker (LSW), Clinical Social Work Candidate (SWC), Marriage and Family Therapist Candidate (MFTC), Psychologist Candidate (PSYC), Addiction Counselor Candidate (ADDC)); Licensed clinicians enrolled with Medicaid and for a maximum of 90 days while completing contracting and credentialing with a RAE
- 4.2. **Licensed, supervising clinicians** must have these qualifications:

- 4.2.1. Active license in Colorado without restrictions, conditions, or stipulations from DORA for at least 2 years
- 4.2.2. Credentialed with RMHP/United Healthcare

5. Requirements

5.1. Organizational requirements:

- 5.1.1. Organizational or group NPI
- 5.1.2. Malpractice insurance with demonstration of sufficient liability coverage for supervisors' supervision activities and for the clinical work performed by trainees and unlicensed practitioners, and minimum limits of liability of \$1 million per incident and \$3 million aggregate
- 5.1.3. Policy describing how providers credential their practitioners, requiring monthly checks of federal exclusion databases (OIG and SAM) of the unlicensed providers.

5.2. Supervision policy requirements

- 5.2.1. Requires that supervisee's mandatory disclosure statement clearly states they are under supervision and by whom
- 5.2.2. Requires regular evaluation of the supervisee's progress with a rubric that is tied to the responsibilities assigned
- 5.2.3. Addresses frequency of formal supervision sessions
- 5.2.4. Addresses frequency that supervisor reviews (and provides feedback on) documentation
- 5.2.5. Addresses a variety of supervisory mechanisms, including direct observation (recordings of counseling sessions, live observation), case conceptualization presentations, review of documentation, and/or individual/triadic/group supervision
- 5.2.6. Outlines protocol for managing a client in crisis or urgent/emergent situations including the availability of the supervisor to the supervisee in the event of a crisis
- 5.2.7. Addresses clinical skills, professional behaviors, ethical/legal issues, cultural considerations, evidence-based practices
- 5.2.8. Addresses maximum number of supervisees a supervisor oversees
- 5.2.9. Requires licensed supervisor to regularly evaluate documentation and co-sign documentation as required by regulation or contract (assessments and treatment plans); recommend all documentation produced by supervisee is co-signed by supervisor.
- 5.2.10. Outlines how the supervisor will document supervision sessions, and, if applicable, the supervisee's progress toward attainment of the required competencies to be

deemed qualified to practice independently

- 5.2.11. Requires supervisor and supervisee to follow all applicable laws and ethical guidelines of the profession • LPC Supervisors meet all criteria for supervisors outlined in 4 CCR 737-1 • LAC, LCSW, LMFT, PsyD/PhD Supervisors have advanced training/experience in supervising unlicensed clinicians

6. Procedure

- 6.1. Licensed supervisor reviews and agrees to this policy
- 6.2. Licensed supervisor attests to the terms (formal attestation form with signature) and returns form to RMHP.

7. Revision History

Date	Revision Number	Description of Change
11/29/23	01	Formal addition of CHP+ to policy