



## PROVIDER ALERT

### GRADUATE LEVEL/STUDENT AND SUPERVISION REQUIREMENTS

MAY 24, 2019

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**The Department has requested the following reminder be issued:**

#### **Graduate Level and Student Requirements**

Claims submitted by group and individual practices for services delivered by students/interns, bachelor level clinicians, and graduate level clinicians are **not reimbursable** under the PBHS (neither Medicaid nor State funds). To participate in the PBHS an individual “shall be approved for participation and have an individual rendering number” issued by the Department (COMAR 10.09.36.03).

Additionally, “individual clinicians shall be licensed and legally authorized to practice independently by the appropriate Board” (COMAR 10.09.59.04).

Furthermore, clinicians must bill under their individual Medicaid rendering number; billing under someone else’s individual Medicaid rendering number is prohibited and if identified during an audit will result in retraction of funds. Claims submitted by OMHCs (Outpatient Mental Health Clinics) for services delivered by graduate level clinicians and students/interns under OMHC supervision **are reimbursable** under the PBHS.

Students/interns are required to be “pursuing degrees at accredited colleges or universities toward state licensure as mental health professionals; deliver services as part of formal fieldwork placements through accredited colleges and universities; comply with their respective professional licensing laws, including supervision requirements, and are appropriately screened, oriented to the program’s policies and procedures, and supervised” (COMAR 10.21.17.11).

Individuals who have already graduated from a professional training program but are not yet licensed are not considered interns and may not practice until they receive appropriate licensure or certification.

Claims submitted by Provider Type 50 (SUD program) or PT 32 (Opioid Treatment Program) for services delivered by graduate level clinicians and certified clinicians are reimbursable. However, there is no reimbursement for

services rendered solely by students/interns under a PT 50 or PT 32 under the PBHS.

Definition of an Alcohol and Drug Trainee (ADT): An ADT is an individual who meets the requirements specified in COMAR 10.58.07.08 and the Board of Professional Counselors and Therapists (Board) has issued a letter to the individual authorizing the individual to practice alcohol and drug counseling as a trainee for 2 years, renewable in 2-year increments to a total of 6 years.

Students/interns are **not** alcohol and drug trainees (ADT) if they do not meet the criteria described above.

### **Supervision Requirements**

All graduate level clinicians (e.g.: LGPC, LMSW, LGADC), certified clinicians (e.g.: CAC-AD, CSC-AD), trainees, and students/interns must be supervised by board approved supervisors based on their respective Boards' regulations.

For example, LMSW social workers must be supervised by a Board of Social Work Examiners approved supervisor; counselors, certified clinicians, and ADTs must be supervised by a Board of Professional Counselors and Therapists approved supervisor; students/interns must be supervised by their respective practice Board approved supervisor.

Note: Supervisors of staff in SUD programs must have specific approval from the Board of Professional Counselors to perform this function. All supervisors who have access to Protected Health Information (PHI) need to have, at a minimum, a business agreement with the treating organization.

Graduate level clinicians working as Rehabilitation Specialists in COMAR 10.63 licensed Psychiatric Rehabilitation Programs for adults or minors must be supervised in accordance with their respective Board's regulations.

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