



# Global Commitment Register

December 18, 2015

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GCR 15-013  
FINAL

## **Supervised Billing for Mental Health Providers**

### **Policy Summary:**

Vermont Medicaid is updating its policies related to supervised billing. ‘Supervised billing’ is a way for a supervising provider who is enrolled in Vermont Medicaid to bill for clinical behavioral health services provided by non-licensed personnel under their direct supervision. Providers who are eligible to enroll in Vermont Medicaid must enroll and bill using their own provider number; they cannot bill under another provider’s number.

The following conditions apply to the Medicaid-contracted provider (supervisor) in order to bill for non-licensed clinical services:

1. Supervisors must be licensed and actively enrolled in Vermont Medicaid.
2. All supervising providers must only supervise for services within their scope of practice.
3. For purposes of billing clinical services, any behavioral health provider licensed and enrolled in Medicaid and supervising within their scope of practice may provide supervision under this policy.
4. Supervisors do not need to provide direct services in order to bill for supervised services
5. Supervisors must provide regular, face-to-face ongoing supervision to the unlicensed provider, as outlined in the Secretary of State’s or Vermont Department of Health’s Administrative Rules for the specific provider type.
6. Supervisors must sustain an active part in the ongoing care of the patient.
7. A licensed provider qualified for scope of services must be immediately available in person or by phone within 15 minutes.

The following conditions apply to non-licensed providers in order for the supervisor to bill for non-licensed clinical services:

- Mental health practitioners shall be entered on the roster of non-licensed and noncertified psychotherapists, and must be actively working towards professional licensure.
- Psychologists shall be entered on the roster of non-licensed and noncertified psychotherapists, and must be actively working towards professional licensure.
- Psychiatric Nurse Practitioners shall be a Registered Nurse with a Collaborative Provider Agreement, and must be actively working towards professional licensure.
- Addiction counselors must be actively working towards professional licensure.

A supervised non-licensed provider may provide billable clinical services within the provider's scope of practice, including:

- Diagnosis & Evaluation (with the exception of psychological testing and neuropsychological testing)
- Individual Therapy
- Group Therapy
- Family Therapy
- Medical Evaluation/ Management
- Medication/ Psychotherapy

The following services are not eligible for reimbursement:

- Services rendered by any provider who is eligible to be enrolled as a Vermont Medicaid provider but has not applied to be a Vermont Medicaid Provider.
- Services performed by a non-licensed provider who cannot practice independently and is not actively working towards licensure.
- Psychological testing and neuropsychological testing.

A supervising provider must use their unique provider number for services provided by unlicensed providers.

- a) Modifier "HO" must be used to indicate the service was performed by a master's level non-licensed provider.
- b) Modifier "HN" must be used to indicate the service was performed by a bachelor's level non-licensed intern engaged in a graduate-level mental health master's program.

**Effective Date:**

January 1, 2016

**Authority/Legal Basis:**

[Patient Protection and Affordable Care Act](#)

**Population Affected:**

Mental Health Providers billing Vermont Medicaid (DVHA/DMH/DAIL/VDH/ADAP)

**Fiscal Impact:**

No fiscal impact anticipated.

**Additional Information:**

The full policy on "Supervised Billing for Mental Health Providers" can be found in the Medicaid Provider Manual: <http://vtmedicaid.com/Downloads/manuals.html>.