


SUBJECT: Supervised Practice of Mental Health/ Substance Abuse Trainees		
BUSINESS OWNER:	Quality	Page 1 of 3
DATE APPROVED BY LEADERSHIP: February 8, 2021		ORIGINATION DATE: October 2018
 <hr/> Joshua Plavin, MD, MPH, MBA Vice President and Chief Medical Officer		REVISED: Effective April 1, 2021
		NEXT REVIEW DATE: As needed
		APPLIES TO: All lines of business
REGULATORY/ ACCREDITATION LINKS: 26 V.S.A. § 3265 (disciplines eligible to perform supervision)		
POLICY LINK: N/A		

I. Description

Blue Cross and Blue Shield of Vermont and The Vermont Health Plan, LLC (collectively, “Plan”), support the training of clinical mental health counseling for those working toward full state licensure as clinical mental health counselors. This policy outlines Plan’s expectations regarding the supervisor-trainee relationship.

II. Policy

- a. Definitions: Capitalized terms not otherwise defined in this policy will have the definitions provided in the provider’s contract.
- b. Scope: This policy applies to services provided by individuals engaged in post-degree supervised practice toward licensure. Services provided by an individual providing services as part of his or her education or training program are not generally covered or eligible for reimbursement. If a Plan-contracted provider is acting as a supervisor for a post-degree trainee, Plan expects that all Medically Necessary Covered Services provided to Plan Members under that provider’s supervision will be billed to Plan. If a Plan-contracted provider fails to provide supervision as outlined in this policy, services provided under that provider’s supervision will not be reimbursed and will not be charged to a Plan Member.
- c. Supervisor Requirements
 - i. Must be enrolled, credentialed, and in good standing with Plan
 - ii. Educates trainee on Plan billing requirements and claims process
 - iii. Bills for all Medically Necessary Covered Services provided by the trainee; the services should be billed with the –HO modifier, except for the initial evaluation, which should be billed without the –HO modifier
 - iv. Qualifies as one of the following:
 1. Licensed physician certified in psychiatry by the American Board of Medical Specialties:
 2. Licensed psychiatric nurse practitioner
 3. Licensed psychologist
 4. Licensed clinical social worker
 5. Licensed marriage and family therapist
 6. Licensed clinical mental health counselor
 7. A person certified or licensed in another jurisdiction in one of the professions described above or in a profession that is a substantial equivalent
 8. A supervisor trained by a regional or national organization that is approved by the Vermont State board
 - v. Provides the trainee with regular, on-going supervision. Plan encourages a supervisor to keep regular and thorough documentation of all supervision provided. Sample documentation is available on Plan’s provider website.
 - vi. Sustains an active part in the ongoing care of patients treated by the trainee

d. Trainee Requirements

- i. The trainee is working toward licensure in an allied mental health field, and the trainee falls into one of the following categories:
 1. Master's level –
 - a. has earned a master's degree and is completing his/her supervised practice hours toward licensure AND
 - b. is working toward a type of license that is eligible for participation with Plan AND
 - c. is registered on the roster of psychotherapists who are non-licensed and noncertified (or the equivalent if in a jurisdiction outside of Vermont).
 2. Advanced Practice Registered Nurse – is completing his/her supervised practice hours toward licensure as either a psychiatric mental health nurse practitioner or a psychiatric clinical nurse specialist
 3. Apprentice Addiction Professionals (AAPs) and Alcohol and Drug Counselors (ADCs)
 - a. Is working for a Vermont designated agency AND
 - b. Is working toward a type of license that is eligible for participation with Plan
 4. Psychologist –
 - a. is completing his/her supervised practice hours toward obtaining a psychologist license AND
 - b. if not already licensed as a clinical mental health counselor, marriage and family therapist, or social worker, is registered on the roster of psychotherapists who are non-licensed and noncertified (or the equivalent if in a jurisdiction outside of Vermont).
- ii. Persons engaged in supervised practice toward licensure must identify themselves to Members as trainees and must comply with applicable disclosure requirements.

e. Exclusions

- i. The processes outlined in this policy do not apply to scenarios where a provider is eligible to submit claims to Plan for reimbursement.
- ii. The processes outlined in this policy do not apply to scenarios where a provider may not practice independently and is not completing post-degree supervised practice hours for licensure.

III. Distribution

Plan makes this policy available to network practitioners and appropriate staff members. The quality and provider relations departments facilitate publication of these criteria in the provider newsletter and on the provider website.

IV. Review

Plan's Network Quality and Credentialing Committee reviews this policy as needed to ensure consistency with current business practices and to incorporate the latest regulatory and accreditation standards, as applicable.