

**EFFECTIVE DATE:** 02|01|2023

**POLICY LAST UPDATED:** 02|15|2023

## OVERVIEW

The intent of this policy is to provide information regarding supervisory protocol for Licensed Clinical Social Workers (LCSWs), Postdoctoral Clinicians, Mental Health Counselor Associates (MHCAs), and Marriage and Family Therapist Associates (MFTAs) pursuing their psychologist license having the ability to render services under a supervising independently licensed behavioral health clinician credentialed with Blue Cross & Blue Shield of Rhode Island (BCBSRI).

## MEDICAL CRITERIA

Not applicable

## NOTIFICATION OF ADMISSION

Notification of admission is required for some behavioral health outpatient professional services. Contact BCBSRI's Behavioral Health Utilization Management at 800-274-2958.

## POLICY STATEMENT

BCBSRI has implemented a supervisory protocol process whereby Licensed Clinical Social Workers (LCSWs), Postdoctoral Clinicians, Mental Health Counselor Associates (MHCAs), and Marriage and Family Therapist Associates (MFTAs) may render services under the supervision of an independently licensed behavioral health clinician. BCBSRI will allow for a Licensed Clinical Social Worker practicing under the supervision of a Licensed Independent Clinical Social Worker (LICSW), a postdoctoral clinician practicing under the supervision of a Licensed Psychologist, a Mental Health Counselor Associate practicing under the supervision of a Licensed Mental Health Counselor (LMHC), and a Marriage and Family Therapist Associate practicing under the supervision of a Licensed Marriage and Family Therapist (LMFT) to render services to our members in a professional outpatient setting. BCBSRI does not credential LCSWs, Postdoctoral clinicians, MHCAs, or MFTAs.

Professional outpatient providers who are credentialed with BCBSRI must submit a supervisory protocol and receive approval from BCBSRI prior to an LCSW, Postdoctoral clinician, MHCA, or MFTA rendering any services for reimbursement. The supervisory protocol is the process by which the professional outpatient provider who is credentialed with BCBSRI ensures that the non-licensed clinician is duly supervised.

All supervisory protocols must be sent to [Behavioralhealth@bcbsri.org](mailto:Behavioralhealth@bcbsri.org). Please include a cover sheet with documentation that includes the following:

- a. Documentation of the supervising clinician being credentialed with BCBSRI
- b. A written policy addressing the supervisory protocol utilized at the clinic
- c. The process by which documentation of the patient's overall treatment (assessment, treatment plan, and any changes to the diagnosis) is reviewed by the supervising BCBSRI-credentialed provider(s).
- d. A clear process for informing the patient that a clinician who is not credentialed with BCBSRI is providing the service to them and documentation of the patient's awareness of same.
- e. A process that supports the supervisor(s) and the supervisee meeting on a regular basis, in accordance with the Rhode Island Department of Health guidelines.
- f. The supervising clinician's Tax ID and National Provider Identification (NPI)

## COVERAGE

Benefits may vary between groups/contracts. Please refer to the appropriate Evidence of Coverage or Subscriber Agreement for applicable Behavioral Health Services for benefits and applicable deductibles and/or co-payments. Services may be rendered to Commercial and Medicare Members. Per CMS Chapter 15 of the

Medicare Benefit Policy Manual which indicates “Direct supervision in the office setting does not mean that the physician must be present in the same room with his or her aide. However, the physician must be present in the office suite and immediately available to provide assistance and direction throughout the time the aide is performing services.”

### **CODING**

Unless specified in a specific payment policy, BCBSRI follows correct coding and payment guidelines published by National and Regional CMS (including DMEMAC) and other correct coding national standards such as Current Procedural Terminology (CPT). Please refer to the Coding and Payment Guidelines policy for additional details. All services rendered should be in accordance with correct coding.

Claims must be submitted by the independently licensed, BCBSRI credentialed clinician and must include an HO modifier to indicate services rendered by an LCSW, MHCA or MFTA. An HP modifier must be included to indicate services rendered by a Post Doctorate Clinician (please refer to payment policy for Behavioral Health Outpatient Professional Services for CPT codes).

### **RELATED POLICIES**

Autism Spectrum Disorders Mandate  
Behavioral Health Outpatient Professional Services  
Coding and Payment Guidelines  
Health and Behavior Assessment  
Preventive Services for Commercial  
Provider Credentialing and Recredentialing Policy  
Psychological and Neuropsychological Testing  
Telemedicine Services for Commercial Products  
Telemedicine Services for Medicare Advantage  
Transcranial Magnetic Stimulation

### **PUBLISHED**

Provider Update, March 2023  
Provider Update, July 2022  
Provider Update, August 2021

#### **CLICK THE ENVELOPE ICON BELOW TO SUBMIT COMMENTS**

This medical policy is made available to you for informational purposes only. It is not a guarantee of payment or a substitute for your medical judgment in the treatment of your patients. Benefits and eligibility are determined by the member's subscriber agreement or member certificate and/or the employer agreement, and those documents will supersede the provisions of this medical policy. For information on member-specific benefits, call the provider call center. If you provide services to a member which are determined to not be medically necessary (or in some cases medically necessary services which are non-covered benefits), you may not charge the member for the services unless you have informed the member and they have agreed in writing in advance to continue with the treatment at their own expense. Please refer to your participation agreement(s) for the applicable provisions. This policy is current at the time of publication; however, medical practices, technology, and knowledge are constantly changing. BCBSRI reserves the right to review and revise this policy for any reason and at any time, with or without notice. Blue Cross & Blue Shield of Rhode Island is an independent licensee of the Blue Cross and Blue Shield Association.

