

TennCare Policy Manual	Section: Providers
Policy No: PRO 22-001 (Rev. 2)	Date: May 10, 2024

Behavioral Health Services Furnished by Qualified Graduate Students

Purpose/Policy

The purpose of this policy is to explain how—

1. A student pursuing a graduate degree may provide behavioral health services to TennCare members, and
2. An agency providing supervision to the student may receive reimbursement from a TennCare managed care organization for the services rendered by the student.

It is the policy of the Division of TennCare that behavioral health services may be provided to TennCare members by a qualified graduate student who is operating in an approved setting and receiving appropriate supervision.

Section 1: Qualified Graduate Student

To render behavioral health services to TennCare members before attaining a graduate degree, a student must be considered a **qualified graduate student**. Individuals are considered qualified graduate students if they are currently enrolled in a master's or other graduate level academic program that has a behavioral health concentration and is part of a regionally accredited institution, and if the following factors apply:

- 1.1** The graduate program in which the student is participating is in a field eligible for licensure in behavioral health in Tennessee. Examples include psychology, social work, professional counseling, and marriage and family therapy.
- 1.2** The student is placed by the graduate program as a trainee for a clinical field placement, practicum, internship, or similar experience as a training requirement for a master's or doctoral degree.
- 1.3** The student's graduate program has furnished a letter from its chair or training director to the agency supervising the student that confirms not only that the student is enrolled in the program, but also that the student is pursuing a master's or doctoral degree and is in good standing with the program. The letter also confirms that the student's placement as a trainee is a requirement of the graduate program.
- 1.4** There is a formal agreement (e.g., a Memorandum of Understanding) between the graduate program and the agency supervising the student that outlines the placement of the student for a supervised training practice and that describes the responsibilities of both the graduate program and the supervising agency.
- 1.5** The student provides only services that he/she is qualified (based on educational background and training) to provide and that the student's designated supervisor is qualified to supervise.

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Section 2: Approved Setting

The clinic or agency in which the qualified graduate student renders behavioral health services to TennCare members is considered an approved setting if it meets the following criteria:

- 2.1** The facility is licensed as a Mental Health Outpatient Facility by the Tennessee Department of Mental Health and Substance Abuse Services.
- 2.2** The facility's contract with a TennCare managed care organization (MCO) allows the agency to render professional behavioral health services by a qualified graduate student under supervision.

Section 3: Appropriate Supervision

An individual supervising one or more qualified graduate students who render behavioral health services to TennCare members must meet the following requirements:

- 3.1** The primary supervising professional is licensed at an individual level and is practicing and providing supervision as defined and required by the scope of his/her license.
- 3.2** The supervising professional is credentialed and enrolled in the TennCare MCO network under the Mental Health Outpatient Facility that will be reimbursed for the supervisory services.
- 3.3** The primary supervising professional is onsite whenever the qualified graduate student is furnishing behavioral health services to TennCare members.
- 3.4** Additional requirements intended to ensure quality of care for TennCare members and an appropriate training experience for the qualified graduate student are as follows:
 - Supervising professionals may oversee a maximum of four qualified graduate students providing services to TennCare members during an academic year.
 - The primary supervising professional must provide the qualified graduate student at least one hour of individual, face-to-face supervision per week in addition to other types of supervision that the student receives (such as group supervision, case conference, and supervision by a faculty member in the student's on-campus graduate program).
 - The primary supervising professional must be present and practicing at the same licensed facility at which the qualified graduate student is practicing, and must be available for consultation in case of an emergency. If the primary supervising professional is absent, another qualified supervisor must be present and available for consultation. While a qualified supervisor is required to be onsite at all times in which a qualified graduate student is practicing, supervision requirements may be fulfilled through videoconferencing.

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- The supervision provided meets the supervision guidelines and standards required by the MCO that contracts with the agency/facility.

Section 4: Administrative and Billing Issues

4.1 The primary supervising professional must maintain adequate medical and administrative records, including documentation of the qualified graduate student’s placement, supervision logs, and medical records. Furthermore, the records must be available for representatives of the TennCare MCO to review upon request.

4.2 Behavioral health services rendered by the qualified graduate student must be billed to the TennCare MCO under the National Provider Identifier and the Medicaid identification number of the licensed supervising provider.

Office of Primary Responsibility

Behavioral Health Operations

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