

TennCare Policy Manual	Section: Providers
Policy No: PRO 22-002 (Rev. 2)	Date: March 11, 2022

Behavioral Health Services Furnished by Candidates for Licensure

Purpose/Policy

The purpose of this policy is to explain how a therapist pursuing licensure may deliver therapy services to TennCare members, and how the agency employing the therapist may be reimbursed for those services. The policy describes not only the requirements that such a therapist must currently meet, but also the requirements that will apply once certain workforce issues in the public mental health system in Tennessee have been resolved.

Current Requirements

In order for an unlicensed master’s level therapist to deliver therapy services in a TennCare contracted mental health agency, the following criteria must **currently** be met:

- The facility in which the therapist is practicing must be licensed as a Mental Health Outpatient Facility by the Tennessee Department of Mental Health and Substance Abuse Services.
- The facility in which the therapist is practicing contracts with one or more TennCare managed care organizations (MCOs) in a manner that allows for the unlicensed therapist to render behavioral health services while under the supervision of a licensed professional.

Future Requirements

The rest of this policy document describes the requirements that may be applied to unlicensed master’s level therapists delivering behavioral health services to TennCare members **in the future**, i.e., once the aforementioned workforce issues in Tennessee’s public mental health system have been resolved. At that time, the Division of TennCare will allow behavioral health services to be provided to TennCare members by a trainee pursuing licensure when the trainee is qualified to render the services, is receiving appropriate supervision, and has obtained a preliminary/provisional license from the appropriate Health Related Board. (A grandparenting option may also be considered.) The rest of this policy describes those future requirements in greater detail.

Section 1: Candidate for Licensure

To render behavioral health services to TennCare members before attaining licensure, an individual must be considered a **candidate for licensure**. Individuals are considered candidates for licensure if they have completed a master’s or doctoral degree in a behavioral health field but are not independently licensed, and if they are employed by—and rendering services in—a clinic or agency as follows:

- 1.1 The facility is licensed as a Mental Health Outpatient Facility by the Tennessee Department of Mental Health and Substance Abuse Services.
- 1.2 The facility contracts with the TennCare MCO in a manner that allows the candidate for licensure

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(as defined in this policy) to render behavioral health services.

- 1.3** The candidate for licensure is under appropriate supervision from a licensed professional who is qualified to provide both services to members and supervision. The supervision provided by the licensed professional meets the requirements of the licensing board issuing the license (including a temporary license) that the licensure candidate is pursuing. In addition, the supervision provided also meets the supervision guidelines and standards imposed by the MCO with which the agency/facility contracts.
- 1.4** The licensed professional supervising the licensure candidate (or the agency that employs the licensed professional) is credentialed, contracted, and/or enrolled in the network of the TennCare MCO that will be reimbursing for services.
- 1.5** The candidate for licensure has applied for a preliminary/provisional license from the Tennessee Health Related Board (HRB) by which the candidate intends to be licensed. Furthermore, the licensure candidate’s scope of practice is defined by the same statutes and regulations that govern the HRB from which the preliminary/provisional license was obtained. (Additional information about preliminary/provisional licensure appears below in the section entitled “Registration with Appropriate HRB.”) Candidates for licensure may not deliver behavioral health services to TennCare members until they have applied for the temporary license. A licensure candidate may practice for up to six months after applying for a temporary license while awaiting approval. In the event the licensure candidate is not granted approval within this six-month period (including a scenario in which the application is denied), the candidate must discontinue provision of behavioral health services to TennCare members.

Section 2: Behavioral Health Services Requiring Supervision

Candidates for licensure may furnish behavioral health services to TennCare members—and facilities supervising the candidate may bill for those services—when the services fall within the scope of the candidate’s training and preliminary/provisional license.¹ These services include, but are not limited to, the following:

- 2.1** Prevention and treatment of mental, emotional, and/or behavioral disorders, addictions, and associated disorders that interfere with mental health, as well as evaluation of treatment plans for these disorders;
- 2.2** Provisional diagnoses in assessment, diagnosis, treatment planning, and other activities to treat the

¹ Tennessee HRBs allow Licensed Psychological Examiners to be supervised for provision of services that are outside their scope of practice. This exception is permitted in case such an individual is trying to accrue the supervised experience to be licensed as a Senior Psychological Examiner. This policy does not prohibit the practice (or reimbursement for it) as long as supervision is furnished in compliance with the requirements of the Board of Examiners in Psychology and the provisions of this policy on qualifications of agencies, supervisors, and supervision.

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disorders identified above in 2.1, including being qualified to use the Diagnostic and Statistical Manual of Mental Disorders, the International Classification of Diseases, and other diagnostic classification systems;² and

- 2.3** Conducting assessments that include psychological testing and/or the evaluation or assessment of personal characteristics, such as intelligence, personality, mental status, psychopathology, abilities, achievement, interests, aptitudes, neuropsychological functioning, disabilities, developmental deviation, and/or alcohol and substance use and abuse.

It should be noted that not all candidates for licensure or their supervisors will be qualified by their training and the scope of their intended license type to offer all of the behavioral health services listed in this section.

Section 3: Registration with Appropriate HRB

Candidates for licensure may not deliver behavioral health services to TennCare members until they have applied for a preliminary/provisional license from the Tennessee Health Related Board (HRB) by which they intend to be licensed. Usually, these types of licenses are limited in duration. Preliminary/provisional licenses that fall within the scope of this policy are as follows:

- 3.1** Individuals may apply and be approved for a temporary license when seeking licensure as—

- Psychologist with Health Services Provider (HSP) designation,
- Licensed Professional Counselor with Mental Health Services Provider (MHSP) designation, or
- Licensed Marital and Family Therapist.

- 3.2** Individuals seeking licensure as a Licensed Clinical Social Worker (LCSW) may either obtain a temporary licensed master’s social worker license, or fulfill the requirements to be a Licensed Master’s Social Worker (LMSW). The LMSW designation may not serve as an endpoint for the licensure candidate but must instead be used to obtain the supervised experience for licensure as an LCSW. Verification of the candidate’s intent to pursue licensure as an LCSW will be satisfied by evidence that an appropriate supervisory relationship has been secured.

Section 4: Administrative and Billing Issues

- 4.1** The licensure candidate’s supervisor must maintain adequate medical and administrative records, including documentation of licensure, supervision logs, and notes regarding the location and date on which supervision took place. Furthermore, the records must be available for representatives of TennCare or the member’s MCO to review upon request.

² All diagnostic activities are subject to review and approval by the licensure candidate’s licensed supervisor.

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4.2 Behavioral health services rendered by the candidate for licensure must be billed to the TennCare MCO under the National Provider Identifier and the Medicaid identification number of the licensed supervising provider or agency.

Office of Primary Responsibility

Behavioral Health Operations

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