



## COLORADO

Department of Health Care  
Policy & Financing

### Supervision Policy for Medicaid Billable Behavioral Health Services

Health Care Policy and Financing (HCPF) has developed standards to permit unlicensed professionals and pre-licensed clinicians to deliver services to Health First Colorado Members. These standards are intended to safeguard the public while also maintaining the integrity of the healthcare profession. HCPF's greatest priority is maintaining a high standard of care for members. The new aligned standards will help ensure that unlicensed providers within behavioral health organizations and integrated care settings receive appropriate supervision and oversight, with the goal of quality member care that also supports expanding the workforce pipeline.

Unlicensed professionals or pre-licensed clinicians (supervised by a licensed clinician) include the following:

- Peer Support Professionals
- Qualified Behavioral Health Assistants (QBHA)
- Bachelor's level
- Certified Addiction Technicians (CAT)
- Certified Addiction Specialists (CAS)
- Master's level unlicensed BH professionals
- Master's/doctoral level interns
- Master's/doctoral level pre-licensed clinicians (registered with DORA as a licensure candidate, ie Professional Counselor Candidate (LPCC), Licensed Social Worker (LSW), Clinical Social Work Candidate (SWC), Marriage and Family Therapist Candidate (MFTC), Psychologist Candidate (PSYC), Addiction Counselor Candidate (ADDC).
- Licensed clinicians enrolled with Medicaid who are in the process of completing contracting and credentialing with a RAE (for a maximum of 90 days ).

All providers who employ unlicensed professionals must complete an attestation (and update annually) and submit along with policies for supervision outlined below to any RAE the billing provider works with confirming adherence to rules and standards outlined below. Compliance will be monitored through regular RAE audit activities.

#### General standards for licensed clinician serving in supervisory role

Active license in Colorado without restrictions, conditions, or stipulations from DORA for at least two years. Any licensing restriction or concerns about supervision of others may be reviewed by each RAE on a case by case basis.
Enrolled with Health First Colorado (Medicaid) and serving Medicaid clients
Completed and current CAQH profile
Credentialed by the RAE or work for an institution that is credentialed at the institutional level or part of a delegated credentialing arrangement

## Organizational requirements

Organizational or group NPI
Malpractice insurance with demonstration of sufficient liability coverage for supervisors' supervision activities and for the clinical work performed by trainees and unlicensed practitioners, and minimum limits of liability of \$1 million per incident and \$3 million aggregate
Policy describing how providers credential their practitioners, requiring monthly checks of federal exclusion databases (OIG and SAM) of the unlicensed providers.
Supervision policy (described below) <ul style="list-style-type: none"><li>Requirements may also be contained within a supervisory contract and/or employee handbook.</li></ul>

## Supervision policy requirements

Requires that supervisee's mandatory disclosure statement clearly states they are under supervision and by whom
Requires regular evaluation of the supervisee's progress with a rubric that is tied to the responsibilities assigned
Addresses frequency of formal supervision sessions
Addresses frequency that supervisor reviews (and provides feedback on) documentation
Addresses a variety of supervisory mechanisms, including direct observation (recordings of counseling sessions, live observation), case conceptualization presentations, review of documentation, and/or individual/triadic/group supervision
Outlines protocol for managing a client in crisis or urgent/emergent situations including the availability of the supervisor to the supervisee in the event of a crisis
Addresses clinical skills, professional behaviors, ethical/legal issues, cultural considerations, and evidence based practices
Addresses maximum number of supervisees a supervisor oversees <ul style="list-style-type: none"><li>Per HCPF policy, a licensed clinician cannot serve as an individual or group supervisor for more than a total of eight (8) unlicensed professionals and/or pre-licensed clinicians at any one time</li><li>The supervising clinician must have a minimum of one (1) hour per week available for each supervisee</li></ul>
Requires licensed supervisor to regularly evaluate documentation and co-sign documentation as required by regulation or contract (assessments and treatment plans);
Outlines how the supervisor will document supervision sessions, and, if applicable, the supervisee's progress toward attainment of the required competencies to be deemed qualified to practice independently
Requires supervisor and supervisee to follow all applicable laws and ethical guidelines of the profession <ul style="list-style-type: none"><li>LPC Supervisors meet all criteria for supervisors outlined in 4 CCR 737-1</li><li>LAC, LCSW, LMFT, PsyD/PhD Supervisors have advanced training/experience in supervising unlicensed clinicians</li></ul>