



State of New Jersey  
Department of Human Services  
Division of Medical Assistance & Health Services

# NEWSLETTER

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Volume 28 No. 09

July 2018

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**TO:** Independent Clinics – **For Action**  
Health Maintenance Organizations – **For Information Only**

**SUBJECT:** Billing for Student Interns

**EFFECTIVE:** Immediately

**PURPOSE:** To provide clarification concerning the use of, and subsequent billing for, student interns in an Independent Clinic-Mental Health or Independent Clinic-Drug/Alcohol setting.

**BACKGROUND:** With the implementation of Medicaid coverage for Substance Use Disorder (SUD) services, there is a need to address which standards to apply to the various student interns utilized by independent clinics for mental health and SUD treatment services. Terms such as intern counselor and student intern vary among different types of licensure. Some interns are able to provide services (depending on their licensing board and the educational level they have obtained) while others cannot. This Newsletter shall clarify services that may or may not be billed when provided by student interns working in an independent clinic.

**ACTION:** Only staff possessing the appropriate clinical background and educational qualifications (determined by the licensing board governing their clinical discipline) may provide the diagnosis, assessment and treatment of clients with SUD, mental health or co-occurring disorders.

Independent clinics, who utilize a variety of licensed practitioners and interns from varying specialties, rely on licensing boards to establish what is, or is not, allowed to be performed within an individual's scope of work. The same practice applies to student interns. Interns may perform only those functions that are allowable as determined by their profession's licensing board. The licensing board shall establish those functions that require supervision and the level the supervision that shall be provided.

Both mental health and drug/alcohol independent clinics may utilize student interns in the provision of services. This allows proper clinical experience as well as meeting the needs of the provider. Several intern positions are defined in regulation:

**SUD-related services:**

"Alcohol and drug counselor intern" means an individual in training working under the clinical supervision of a qualified clinical supervisor as set forth in N.J.A.C. 13:34C-6.2(a) and who is working toward completing the requirements of N.J.A.C. 13:34C-2.3(b)3ii.

"Credentialed intern" means an individual holding an active license as a health care provider as defined in N.J.A.C. 13:34C-1.2, who is working toward completing the requirements of N.J.A.C. 13:34C-2.3(b)3ii under the clinical supervision of a qualified clinical supervisor as set forth in N.J.A.C. 13:34C-6.2A(a).

"Clinical supervision" means the ongoing process of direct review of an alcohol and drug counselor intern and/or a certified alcohol and drug counselor for the purpose of administrative accountability, teaching, quality assurance, training, administering and/or clinical review of alcohol and drug counselor interns and certified alcohol and drug counselors performed by a qualified clinical supervisor who monitors the performance of the core functions of alcohol and drug counseling, providing regular consultation, guidance and instruction with respect to the counseling skills and competencies of the alcohol and drug counselor intern and/or certified alcohol and drug counselor. Clinical supervision of alcohol and drug counselor interns and credentialed interns must be provided consistent with the requirements of N.J.A.C. 12:34C-6.2, 6.2A, 6.3 and 6.4.

### **Social Work:**

"Social work" is defined in regulation separately from clinical social work. Under N.J.A.C. 13:44G-1.2, "clinical social work" means the professional application of social work methods and values in the assessment and psychotherapeutic counseling of individuals, families, or groups; and "social work" means the activity directed at enhancing, protecting or restoring a person's capacity for social functioning, whether impaired by physical, environmental, or emotional factors. Under N.J.A.C. 13:44G: 3.1 and 3.2, the State Board of Social Work Examiners prohibits any individuals other than Licensed Clinical Social Workers (LCSW) and Licensed Social Workers (LSW) under the supervision of an authorized LCSW, consistent with the requirements of N.J.A.C. 13:44G-8, from providing clinical social work services at an independent clinic.

A "social work intern" is listed in N.J.S.A 45:15BB-5 as "a student enrolled in an educational program accredited, or in candidacy for accreditation, by the Council on Social Work Education, if the student is practicing as part of a supervised course of study and is clearly designated by the title 'social work intern". These interns appear to be authorized by the Board to perform non-clinical social work *if properly supervised "during a supervised course of study."* These interns are not authorized by the State Board of Social Work Examiners to provide clinical services in independent clinics, nor are they exempt from the requirements of clinical practice because they are students.

### **Marriage and family therapy:**

N.J.S.A 45:8B-6(b) identifies a student of marriage and family therapy, marriage and family therapy intern or person preparing for the practice of marriage and family therapy under qualified supervision in a training institution or facility recognized by the board, provided the individual is designated by the title "marriage and family therapy intern," or a title clearly indicating the training status. These individuals must be supervised consistent with N.J.A.C. 13:34-4.3 and N.J.A.C. 13:34-2.3.

## **Professional Counselor:**

The Professional Counselor Examiners Committee does not provide a category for interns but rather for masters-degreed licensed associate counselors working toward becoming licensed professional counselors. Under N.J.A.C. 13:34-10.2, “[t]he scope of practice of a licensed associate counselor includes, but is not limited to, counseling, counseling interventions, appraisal and assessment, consulting, referral and research activities, as defined in N.J.A.C. 13:34-10.2, under direct supervision pursuant to the provisions of N.J.A.C. 13:34-13.” Under the same regulation, a qualified supervisor means an individual who holds a clinical license to provide mental health counseling services for a minimum of two years in the state where the services are being provided, and who has: (1) A clinical supervisor's certificate from the National Board for Certified Counselors Center for Credentialing and Education or its successor or the American Association of Marriage and Family Therapy or its successor, or (2) Completed a minimum of three graduate credits in clinical supervision from a regionally accredited institution of higher education. A qualified supervisor must satisfy all requirements set forth in N.J.A.C. 13:34-13.1. Supervision means, at minimum, weekly interactions between a qualified supervisor who monitors the performance of the licensed associate counselor and provides weekly, documented, face-to-face consultation, guidance and instruction with respect to the counseling skills and competencies of the licensed associate counselor. This includes at least 50 hours of face-to-face supervision per one calendar year, at the rate of one hour per week, of which not more than 10 hours may be group supervision.

## **Psychologists:**

N.J.A.C. 13:42-1.4(a) defines a student of psychology as “a person who is presently registered at a regionally accredited institution and they are matriculated into a graduate program of study leading toward a doctoral degree in psychology or an allied field.” Under N.J.A.C. 13:42-1.4(b), a student of psychology is exempt from state licensure requirements, provided that the student is under the supervision of an authorized supervisor as set forth in N.J.A.C. 13:42-4.2. The student’s participation in the training program must be a requirement of the graduate psychology program; the student’s transcript must reflect prior academic training specific to the duties assigned to the student; and the student must be clearly identified as a student “intern” or “extern” prior to engaging in psychological practice. (N.J.A.C. 13:42-1.4(c).)

NJ FamilyCare requires that initial assessments, treatment planning and counseling be completed by a licensed clinician working within the scope of their practice. To be considered reimbursable by NJ FamilyCare, counseling provided through the provision of individual, group and/or family therapy, must be provided by licensed or credentialed clinical professionals, or approved student interns under the direct supervision of a licensed clinician consistent with the requirements of the licensing committee or board. Drug and alcohol credentialed interns with a license that allows them to provide SUD counseling may do so independently and consistent with their licensing board’s rules subject to the supervision requirements for completing their training. Drug and alcohol counselor interns shall be supervised consistent with their licensing board requirements. Students of psychology, and Master’s in Social Work or Master’s in

Professional Counseling clinical student interns or associate counselors shall be supervised by licensed clinicians according to their licensing board requirements, and all clinical student intern and associate counselor notes shall be co-signed by the supervising or program supervising licensed clinician.

Only staff possessing the appropriate clinical license and educational qualifications from the appropriate clinical discipline may provide the diagnosis, assessment and treatment of clients with mental health, substance use disorder or co-occurring disorders.

All documentation related to assessment and treatment planning shall be co-signed by the supervising or program supervising licensed professional. Individual notes shall be cosigned as per their individual licensing board requirements. Supervision requirements for counseling interns, credentialed interns, student interns in social work or professional counseling, and students of psychology are set forth by the appropriate educational institution and the appropriate regulatory board or committee for licensure.

If there are any questions regarding the information listed in this Newsletter, please contact The Office of Customer Service at 609-631-4642.

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