COLORADO MEDICAID STANDARDS FOR UNLICENSED PRACTITIONERS

The Regional Accountable Entities (RAEs) have developed aligned standards to permit unlicensed/pre-licensed clinicians to render services to Health First Colorado Members. These standards are intended to safeguard the public while also maintaining the integrity of the healthcare profession. The RAEs' greatest priority is maintaining a higher clinical standard of care for our members. The new aligned standards will help ensure that unlicensed providers within mental health organizations and integrated care settings are receiving appropriate supervision and oversight, with the goal of quality member care that also supports expanding the workforce pipeline.

Unlicensed or pre-licensed practitioners (supervised by a licensed clinician) can include the following:

- Bachelor's level staff functioning as case managers, community outreach staff, and/or peers
- 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 and for a maximum of 90 days while completing contracting and credentialing with a RAE

Provider group will also complete an initial attestation (with follow-up annually) that underscores their adherence to these below rules in conjunction with regular 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
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). • Requirements may also be contained within a supervisory contract and/or employee handbook.

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, evidence-based practices
Addresses maximum number of supervisees a supervisor oversees
Requires licensed supervisor to regularly evaluate documentation and co-sign documentation as required by regulation or contract (assessments and treatment plans); recommend all documentation produced by supervisee is co-signed by supervisor.
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 • LPC Supervisors meet all criteria for supervisors outlined in 4 CCR 737-1 • LAC, LCSW, LMFT, PsyD/PhD Supervisors have advanced training/experience in supervising unlicensed clinicians

Please contact individual RAEs for additional documentation needed for contracting and credentialing:

Rocky Mountain Health Plans (RAE 1)	RAE_BH_PR@rmhp.org
Northeast Health Partners (RAE 2)	
Health Colorado (RAE 4)	
Colorado Access (RAE 3, 5, & DHMC)	Provider.Contracting@coaccess.com
CCHA (RAE 6 & 7)	RAE 6: lorroya.martinez@anthem.com RAE 7: kim.cassidy@anthem.com