

# ForwardHealth **UPDATE**

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## EXPANDED SCOPE OF PRACTICE FOR OUTPATIENT BEHAVIORAL HEALTH PROVIDERS

As a result of 2017 Wisconsin Act 262, which made a number of changes to substance use disorder counseling statutes and administrative rules, ForwardHealth has revised provider specialties to reflect changes in the scopes of practice for certain behavioral health providers. Effective August 1, 2020, licensed psychotherapists will be allowed to provide both mental health and substance use disorder treatment services.

Act 262 broadened the scope of practice for licensed clinical social workers (LCSWs), licensed marriage and family therapists (LMFT), licensed marriage and family therapists in training (LMFT-IT), licensed professional counselors (LPCs), and licensed professional counselors in training (LPC-IT). This change allows these providers to offer both mental health and substance use disorder treatment services without obtaining a separate substance use disorder specialty or substance abuse counselor (SAC)/clinical substance abuse counselor (CSAC) certification from the Wisconsin Department of Safety and Professional Services. This ForwardHealth Update explains the changes

## AFFECTED PROGRAMS

BadgerCare Plus, Medicaid

## TO

Adult Mental Health Day Treatment Providers, Advanced Practice Nurse Prescribers With Psychiatric Specialty, Community Support Programs, Comprehensive Community Services Providers, Crisis Intervention Providers, Intensive In-Home Mental Health and Substance Abuse Treatment Services for Children Providers, Masters-Level Psychotherapists, Outpatient Mental Health Clinics, Outpatient Substance Abuse Clinics, Physician Clinics, Physicians, Psychiatrists, Psychologists, Qualified Treatment Trainees, Substance Abuse Counselors, Substance Abuse Day Treatment Providers, HMOs and Other Managed Care Programs

ForwardHealth has made to align with this new scope of practice for these Department of Safety and Professional Services licensures.

## Licensed Psychotherapist Scope of Practice and Name Changes

ForwardHealth will allow all licensed psychotherapists enrolled in Wisconsin Medicaid to provide both mental health and substance use disorder treatment services.

There will no longer be a distinction between licensed psychotherapists and licensed psychotherapists with SAC certification. These providers will now be enrolled as a single specialty: licensed psychotherapist. LCSWs, LMFTs, and LPCs with the SAC/CSAC certification may

continue to render and bill for both mental health and substance use disorder treatment services. LCSWs, LMFTs, and LPCs who do not have a SAC/CSAC certification will now be able to render both mental health and substance use disorder treatment services as well. Providers currently enrolled with Wisconsin Medicaid will not be required to take any action for these changes to be in effect.

Because SAC/CSAC certification is no longer required for these licensure types, ForwardHealth has removed SAC/CSAC from the provider title to align with Act 262 and eliminate confusion.

**“ForwardHealth will allow all licensed psychotherapists enrolled with Wisconsin Medicaid to provide both mental health and substance use disorder treatment services.”**

IF ...	THEN ...
The provider is an: <ul style="list-style-type: none"> <li>• LCSW without SAC/CSAC</li> <li>• LMFT without SAC/CSAC</li> <li>• LPC without SAC/CSAC</li> </ul>	They may provide both mental health and substance use disorder treatment services. Their specialty will remain “licensed psychotherapist.”
The provider is an: <ul style="list-style-type: none"> <li>• LCSW with SAC/CSAC</li> <li>• LMFT with SAC/CSAC</li> <li>• LPC with SAC/CSAC</li> </ul>	Their specialty’s name will change from “licensed psychotherapist with SAC” to “licensed psychotherapist.” They may continue to provide both mental health and substance use disorder treatment services.

## Qualified Treatment Trainee Changes

Previously, providers with LMFT-IT, LPC-IT, advanced practice social worker (APSW), and independent social worker (ISW) credentials were included in

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the qualified treatment trainees (QTTs) provider enrollment specialty. Act 262 broadened the scope of practice for LMFT-IT and LPC-IT, allowing them to render both mental health and substance use disorder services. However, Act 262 included continued requirements for APSWs and ISWs to obtain a substance abuse specialty designation in order to render substance use disorder services.

To align with these changes to the scope of practice, effective August 1, 2020, ForwardHealth will allow only providers with LMFT-IT and LPC-IT credentials to enroll as QTTs. These providers will be allowed to render both mental health and substance use disorder services under required supervision. LMFT-IT and LPC-IT providers currently enrolled as QTTs with Wisconsin Medicaid will not be required to take any action for these changes to be in effect.

Effective August 1, 2020, ForwardHealth will allow providers with APSW or ISW credentials to enroll only as certified psychotherapists or certified psychotherapists with substance abuse specialty, depending on their certifications. Both specialties will be allowed to render mental health services, but only enrolled certified psychotherapists with a SAC, SAC in Training, or substance abuse specialty designation will be allowed to render substance use disorder services. After obtaining an LCSW license, these providers may enroll as licensed psychotherapists. APSW and ISW providers currently enrolled as QTTs with Wisconsin Medicaid should update their enrollment to certified psychotherapist or certified psychotherapist with SAC.

PROVIDER TYPE	FOR DATES OF SERVICE BEFORE AUGUST 1, 2020	FOR DATES OF SERVICE ON AND AFTER AUGUST 1, 2020
<ul style="list-style-type: none"> <li>LMFT-IT</li> <li>LPC-IT</li> </ul>	Enrolled as a QTT; may provide only mental health services	Enrolled as a QTT; may provide both mental health and substance use disorder treatment services
<ul style="list-style-type: none"> <li>APSW with SAC/CSAC</li> <li>ISW with SAC/CSAC</li> </ul>	Enrolled as a QTT; may provide both mental health and substance use disorder treatment services	Enrolled as a Certified Psychotherapist with substance abuse specialty; may provide both mental health and substance use disorder treatment services
<ul style="list-style-type: none"> <li>APSW without SAC/CSAC</li> <li>ISW without SAC/CSAC</li> </ul>	Enrolled as a QTT; may provide only mental health services	Enrolled as a Certified Psychotherapist; may provide only mental health services

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## Supervision Requirements Reminder

Per Wis. Admin. Code §§ [DHS 35.14](#), [DHS 75.03\(4\)](#), [DHS 105.22](#), and [DHS 105.23](#), ForwardHealth expects providers to adhere to all supervision requirements for the outpatient mental health or outpatient substance abuse clinical setting in which they practice. Comprehensive community services providers may refer to the [Covered Services Rendered by Qualified Treatment Trainees](#) topic (#17257) of the ForwardHealth Online Handbook for more information.

## Documentation Retention

Providers are reminded that they must follow the documentation retention requirements per Wis. Admin. Code § [DHS 106.02\(9\)](#). Information about those requirements can be found in the following Online Handbook topics:

- [Financial Records](#) (#201)
- [Medical Records](#) (#202)
- [Preparation and Maintenance of Records](#) (#203)
- [Record Retention](#) (#204)
- [Availability of Records to Authorized Personnel](#) (#1640)

Providers are required to produce and/or submit documentation to ForwardHealth upon request. ForwardHealth may deny or recoup payment for services that fail to meet these requirements. Refusal to produce documentation may result in sanctions including, but not limited to, termination from the Medicaid program.

## Information Regarding Managed Care Organizations

This Update contains fee-for-service policy and applies to services members receive on a fee-for-service basis only. For managed care policy, contact the appropriate managed care organization. Managed care organizations are required to provide at least the same benefits as those provided under fee-for-service arrangements.

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The ForwardHealth Update is the first source of program policy and billing information for providers.

Wisconsin Medicaid, BadgerCare Plus, SeniorCare, and Wisconsin Chronic Disease Program are administered by the Division of Medicaid Services within the Wisconsin Department of Health Services (DHS). The Wisconsin AIDS Drug Assistance Program and the Wisconsin Well Woman Program are administered by the Division of Public Health within DHS.

For questions, call Provider Services at 800-947-9627 or visit our website at [www.forwardhealth.wi.gov/](http://www.forwardhealth.wi.gov/).