

Introduction

State Plan Amendment ([SPA 23-0026](#)) was finalized and released by DHCS in late December 2023. **Under the direction** of an LPHA, **Clinical Trainee's** can now perform the duties of an LPHA and utilize the CPT codes allowable for LPHAs in the **Mental Health Plan and DMC-ODS**. The supervising LPHA does not have to be physically present when the services are provided.

Additionally, [BHIN 24-023: Standards for Specific Behavioral Health Provider Types and Services](#) was released on June 17, 2024. This BHIN updates the definition of “registered” to include individuals who are **in the process of obtaining their registration** as social worker candidates (ASW), marriage and family therapist candidates (AMFT) and professional clinical counselor candidates (APCC). Therefore, candidates for registration as an ASW, AMFT and APCC who have applied to the Board of Behavioral Sciences (BBS) for their associate’s number **within 90 days of their master’s degree award date** will be allowed to perform duties as a registered associate (see additional information below).

Registered associate staff who do not yet have their Associate number from the BBS will be termed “Associate (application on file).”

Clinical Trainees

Clinical Trainee Qualifications:

- Unlicensed individual enrolled in a post-secondary educational degree program in California
- Degree will allow them to obtain licensure as a Licensed Mental Health Professional (LPHA)
- Participating in a practicum or internship approved by the individual’s educational program
- Supervised by staff who may direct services (see below list)
- Student must meet all requirements of education program and/or applicable licensing board to participate in the practicum or internship and provide rehabilitative mental health services and/or substance use disorder treatment services

Who Can be a Clinical Trainee:

Students working towards the following licenses:

- Psychologist: Pre-Doctoral Intern working towards a degree in psychology, education psychology or in education with a specialization in counseling psychology or education psychology
- LMFT: Pre-Masters Practicum Student enrolled in a master’s level counseling program
- LCSW: Pre-Masters Practicum Student enrolled in a master’s level social work program
- LPCC: Pre-Masters Practicum Student enrolled in a master’s level counseling program

Registered Associates (application on file)

A “registered” ASW, AMFT, and APCC now includes people who have graduated from a master’s program and applied to the BBS to become an associate (BHIN 24-023). This is only allowable if the individual submits their application to the BBS within 90 days of their graduation date. This applies even if they haven’t received their registration number yet.

Associate (Application on File) Qualifications:

- Completed master’s degree which will allow them to obtain licensure as an LCSW, LMFT and/or LPCC
- Supervised by staff who may direct services (see below list)
- Applied to the Board of Behavioral Sciences (BBS) to become an Associate (ASW, AMFT, APCC) within 90 days of their degree award date
- Will immediately alert Santa Cruz County Behavioral Health when their Associates number is assigned OR if their application was rejected

Definition of “Under the Direction of” for Clinical Trainees & Associates (application on file)

“Under the direction of” Definition:

- Providing direct supervision of service delivery of supervisees
- Assumes ultimate responsibility for the services provided by the supervisee
- Responsible to ensure compliance with state law and monitor the welfare of the supervisee’s clients
- Responsible to monitor the professional development of the supervisee

The following staff with **California State Licensure** may supervise / direct the services of a Clinical Trainee or an Associate (application on file):

- Licensed Clinical Social Worker (LCSW)
- Licensed Marriage and Family Counselor (LMFT)
- Licensed Professional Clinical Counselors (LPCC)
- Licensed Clinical Psychologist (PhD)
- Physician Physicians certified in Psychiatry (MD)

Allowable Services (Clinical Trainees and Associates (application on file))

MHP Clinical Trainee & Associates Scope of Practice Allowable Services:

- Assessment, **including** establishing Diagnosis and performing Mental Status Exam (MSE)
- Therapy Services & Psychosocial Rehabilitation Services
- Crisis Intervention (immediate supervision required if 5150 / 5585 evaluation)
- Targeted Case Management / ICC / IHBS
- Therapeutic Behavioral Services (TBS)
- Treatment Planning / Problem List Development
- Completion of CANS / ANSA / PSC-35, etc.

DMC-ODS Clinical Trainee & Associates Scope of Practice Allowable Services:

- Assessment, **including** establishing Diagnosis and performing Mental Status Exam (MSE)
- Treatment Planning / Problem List Development
- Individual / Group Counseling / SUD Crisis Intervention
- Care Coordination
- Patient Education, Recovery Services

Practitioner Enrollment Information

Clinical Trainees and Associates (application on file) must be correctly set up in Avatar, including:

- Practitioner Categories for Coverage – see drop down menu on MHE 10 or MHE 87
- Taxonomy Codes:
 - All Clinical Trainees: **390200000X** (describes the type of staff)
 - Associates (application on file):
 - Associate Clinical Social Worker (ASW): **1041C0700X**
 - Associate Marriage and Family Therapist: **106H00000X**
 - Associate Professional Clinical Counselor: **101YP2500X**

Clinical Trainees and Associates (application on file) must submit the MHE 10 (County staff) or MHE 87 (Contract partner staff) so that County Behavioral Health can correctly configure practitioner enrollment information in avatar.

These forms must be filled out correctly to assure appropriate billing and staff electronic signature.

Documentation

All services provided by a Clinical Trainees and Associate (application on file) **require** the co-signature of their Supervising LPHA – see the [Avatar Clinician’s Manual](#) for detailed guidance (starts on page 177) on how to route documents for co-signature.

The following must be co-signed by the Supervising LPHA:

- CalAIM Assessment, including documentation of the diagnosis in Domain 7
- Mental Status Exam (MSE)
- All progress notes

The Avatar Diagnosis Form may be completed by the Clinical Trainee, the Associate (application on file) or the Supervising LPHA without a co-signature.

Clinical Trainees, Associates (application on file) and Supervising LPHAs must ensure they are following all board requirements for Clinical Trainees / Student Interns.

Resources

State Plan Amendment 23-0026: [\(SPA\) 23-0026](#)

BHIN 24-023: [Standards for Specific Behavioral Health Provider Types and Services](#)

Avatar Clinician’s Manual: [Avatar Clinician’s Manual](#)