



Subject: Guidance for Providers Regarding Student Interns and Limited Permits for CFTSS and HCBS Required to be Provided by a Licensed Practitioner

This document is intended to answer and clarify the various questions surrounding the role of Student Interns and those with a limited permit within the practice of the new State Plan Services of Children and Family Treatment and Support Services (CFTSS) and Waiver Services of Home and Community Based Services (HCBS):

- Student interns and limited permittees can treat Medicaid enrollees under the supervision of a licensed practitioners in that profession who must be enrolled as a Medicaid provider; and the supervising licensed practitioners can submit claims for Medicaid reimbursement of the services provided by the student interns or limited permittees, by entering the supervising practitioner's Medicaid provider identification number on the claim form and reimbursement of the claim will go to the supervising practitioner's Medicaid provider identification number. Children's behavior health and health services regulation, at 18 NYCRR 505.38(b) and (d) require State licensure and practice within the scope of practice under Title VIII of the Education Law.

Are student interns approved to deliver CFTSS and HCBS?

Yes, if the student intern is practicing within the scope of the New York State Education law and supervised by a licensed practitioner in that profession they can deliver CFTSS and HCBS.

Can a practitioner with Provisional or Limited License able to deliver CFTSS and HCBS within the scope of their practice?

Yes, if the limited permittee is practicing under the supervision of licensed practitioner in that profession. According to SED: Limited Permits for Psychologists, Mental Health Counselors, Creative Arts Therapists, Marriage and Family Counselors, and Psychoanalysts - the professions listed above require supervised experience toward licensure. This supervised experience must be completed under the auspices of a Limited Permit issued by NYSED (usually issued for a one-year period).



Are interns approved to deliver OLP? If yes, are the unlicensed provider IDs reported on the claim?

Children's behavioral health and health services regulation, at 18 NYCRR 505.38(b) and (d) require State licensure and practice within the scope of practice under Title VIII of the Education Law. Student interns practicing within the scope of the New York State Education law can deliver OLP. Student interns without a New York State license from the New York State Education Department Office of the Professions cannot enroll in Medicaid. Therefore, when submitting a claim for a service delivered appropriately by an intern, the supervising practitioner (who is supervising the intern)'s NPI number should be reported on the claim form as the Attending Practitioner field, or if the supervising practitioner does not have an NPI number, the OMH (02249154), OASAS (02249145), or OCFS (05448682) unlicensed practitioner ID may be used, in accordance with the guidance

at: https://www.health.ny.gov/health_care/medicaid/redesign/behavioral_health/children/docs/provider_enrollment_npi_memo.pdf.

For more information:

NYSED Office of the Professions <http://www.op.nysed.gov/opsearches.htm> and contact <http://www.op.nysed.gov/contact.htm>

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