



TO: All Specialty Mental Health County & Contracted Managers & Clinical Supervisors
FROM: Serina Sanchez, DHS-BHD Quality Assurance Manager
CC: Chris Marlow, DHS-BHD QAPI Section Manager
DATE: August 17, 2023
RE: Interim Guidance Regarding Claiming for Therapy Services by Graduate Students

With the implementation of the utilization of CPT codes, the Department of Health Care Services (DHCS) acknowledges and recognizes there is a Medi-Cal billing issue for graduate student interns, which includes master's degree and non-licensed PhD students, providing clinical services within their scope of practice. Currently, DHCS, the Medi-Cal Billing Manual, and the CPT codes do not allow for graduate student interns to bill for any therapy services. While the Department awaits additional long-term guidance from DHCS, this memo provides directions on how to code for any therapy services provided by graduate student interns and clarifies how graduate students have been coding for therapy services rendered post-July 1, 2023.

A. Procedure Code for Therapy Services Rendered by Graduate Student Interns

Effective today, graduate student interns that provide therapy services are to document services using the respective CPT procedure codes outlined below—

- Individual Therapy
- Family Therapy-client present
- Group Therapy
- Multiple-Family Group Psychotherapy

All therapy services rendered by graduate student interns will be held for billing by Sonoma County until DHCS provides additional guidance.

B. Requested Information

Please submit the following information by the close of business on Friday, August 25, 2023:

- Information on how graduate students claimed for therapy services rendered from 7/1/23 to 8/16/23.
- For providers not using SmartCare, submit a copy of therapy services rendered by graduate students from 7/1/23 to 8/16/23.

Submit the documentation via secure email to serina.sanchez@sonoma-county.org.