

ForwardHealth **UPDATE**

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POLICY CLARIFICATIONS FOR QUALIFIED TREATMENT TRAINEES

ForwardHealth is clarifying policy regarding qualified treatment trainees (QTTs), including:

- Definition of a QTT
- Provider enrollment
- Allowable services
- Allowable settings
- Claims submission and reimbursement

This ForwardHealth Update also clarifies policy on certified psychotherapist providers.

Clarified Definition of Qualified Treatment Trainee

A QTT is a behavioral health professional who is accumulating supervised hours toward full licensure as an independent practitioner. QTT is an existing Medicaid behavioral health provider specialty that requires supervision from Medicaid-enrolled, licensed providers.

AFFECTED PROGRAMS

BadgerCare Plus, Medicaid

TO

Advanced Practice Nurse Prescribers With Psychiatric Specialty, Community Health Centers, Comprehensive Community Service Providers, Hospital Providers, Intensive In-Home Mental Health and Substance Abuse Treatment Services for Children Providers, Master's-Level Psychotherapists, Outpatient Mental Health Clinics, Outpatient Substance Abuse Clinics, Psychologists, Qualified Treatment Trainees, Substance Abuse Counselors, Tribal Federally Qualified Health Centers, HMOs and Other Managed Care Programs

The information provided in this ForwardHealth Update is published in accordance with Wis. Admin. Code §§ DHS 75.03 and 105.22.

ForwardHealth reimburses for services provided by a QTT. A QTT holds at least **one** of the following degrees:

- A doctoral degree and is working toward full Department of Safety and Professional Services (DSPS) licensure as a licensed psychologist
- A Master’s degree and is working toward full DSPS licensure as a licensed clinical social worker, licensed professional counselor, or licensed marriage and family therapist

Note: Medicaid does not allow clinical students to enroll as providers, although some administrative regulations include clinical students in the definition of QTT. A clinical student who has not completed a graduate degree is not a QTT for the purpose of Medicaid enrollment. The approach for reimbursing for clinical students is defined in Wis. Admin. Code § [DHS 107.01\(2\)](#).

Provider Enrollment

These professionals may enroll in Wisconsin Medicaid as QTTs:

- Professional counselors in-training (LPCs-IT)
- Marriage and family therapists in-training (LMFTs-IT)
- Advanced practice social workers (APSWs)
- Independent social workers (ISWs)
- Unlicensed doctoral psychologists

“Effective on and after August 1, 2024, new APSWs and ISWs seeking supervised hours toward becoming licensed clinical social workers should enroll in Wisconsin Medicaid as QTTs.”

Effective on and after August 1, 2024, new APSWs and ISWs seeking supervised hours toward becoming licensed clinical social workers should enroll in Wisconsin Medicaid as QTTs.

Note: Social workers who require supervision but are not seeking licensure as clinical social workers may continue to enroll in the certified psychotherapist specialty.

APSWs and ISWs who are currently enrolled in Wisconsin Medicaid are not required to enroll as QTTs. APSWs and ISWs who want to update their enrollment to QTT may refer to Section 24 Specialty Change Panel of the [ForwardHealth Portal Demographic Maintenance Tool User Guide \(PDF\)](#) for instructions. QTTs who have completed supervised clinical hours and obtained a license through DSPS can update their enrollment through the demographic maintenance tool.

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QUALIFIED TREATMENT TRAINEE ENROLLMENT GUIDE

Provider Specialty	Current Enrollment Before August 1, 2024	New Enrollment on and After August 1, 2024
LPCs-IT	QTT	QTT
LMFTs-IT	QTT	QTT
Unlicensed doctoral psychologists	QTT	QTT
APSWs working toward licensure or ISWs working toward licensure	Certified Psychotherapist	QTT
APSWs not working toward licensure or ISWs not working toward licensure	Certified Psychotherapist	Certified Psychotherapist

Allowable Services

Services rendered by QTTs are reimbursable when allowed by ForwardHealth administrative regulations and coverage policy. QTT-rendered services are also eligible for reimbursement when they are within a QTT's scope of practice, including:

- Psychotherapy and related mental health services
- Substance use disorder (SUD) services
- Mental health clinical consultations for students per Wis. Stat. § [49.45\(29y\)](#)

Allowable Settings

ForwardHealth no longer limits reimbursement for QTT services to [DHS 35-](#) and [DHS 75-certified](#) clinics. This expands the allowable settings for QTT services.

Providers may be reimbursed for QTT services provided in any setting allowed by state regulations and ForwardHealth coverage policy for the practice of the previously listed allowable services. This will facilitate the use of QTTs in a wider variety of settings, including:

- Certified mental health clinics
- Certified SUD treatment facilities
- Community health centers

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- Homes
- Hospitals
- Nursing homes
- Practitioner offices
- Rural health clinics
- Schools (subject to Wisconsin Department of Public Instruction regulations)
- Tribal federally qualified health centers (FQHCs)

Providers should refer to ForwardHealth Online Handbook Place of Service Codes topic [#6125](#) or the [maximum allowable fee schedule](#) for allowable places of service for a specific billing code.

QTT services rendered via telehealth may be reimbursed when allowed by the coverage policy of the service provided and consistent with telehealth policy described in Telehealth Policy topic [#510](#). Providers may refer to Supervision topic [#22757](#) for guidance about supervision of behavioral health services via telehealth.

QTTs may engage in supervised practice of their discipline under supervision allowed by their licensing boards. QTTs working outside typical practice settings for their discipline may be more closely scrutinized by licensing boards and risk exclusion of training hours for the purpose of licensing requirements.

Note: ForwardHealth reimbursement does not guarantee approval of hours by the Marriage and Family Therapy, Professional Counseling, and Social Work Examining Board or the Psychology Examining Board. QTTs are responsible for confirming with their section or board that supervised hours meet their criteria.

Provider Billing Groups

ForwardHealth allows QTTs to render services through provider billing groups.

Consistent with current ForwardHealth policy allowing licensed independent mental health providers to bill through a group, ForwardHealth permits services rendered by **unlicensed doctoral psychologists, LMFTs-IT, LPCs-IT, APSWs, and ISWs** to be billed through the supervising provider’s billing group.

QUICK LINKS

- [Maximum allowable fee schedule](#)
- [Place of Service Codes topic #6125](#)
- [Supervision topic #22757](#)
- [Telehealth Policy topic #510](#)

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Certified psychotherapists may be reimbursed as rendering providers in a billing group and are not required to practice within an outpatient clinic certified under Wis. Admin. Code ch. DHS 35.

Provider groups are required to report all individual Medicaid-enrolled providers working for the group to ForwardHealth. This information must be reported using the demographic maintenance tool:

- During initial enrollment.
- When revalidating enrollment.
- Any time a change occurs.

Providers may refer to the [ForwardHealth Portal Demographic Maintenance Tool User Guide \(PDF\)](#) for instructions about using the tool.

Claims Submission and Reimbursement

Billing providers are required to use professional level modifiers for services rendered by QTTs:

- Clinical students are identified by using informational modifier U7.
- Master's level QTTs are identified using modifier U6.
- Doctoral level QTTs are identified using modifier HP.

Mental health and substance abuse services performed by QTTs must be billed under the National Provider Identifier (NPI) of an allowable biller, such as a certified agency, hospital, FQHC, billing group, or licensed professional in independent practice. The QTT's NPI number must be included on the claim as the rendering provider.

Each benefit area of the Online Handbook specifies the professional level modifiers required on claims. Providers should also refer to the fee schedule for coverage information and reimbursement rates for services rendered by QTTs.

Documentation Retention

Providers are reminded that they must follow the documentation retention requirements per Wis. Admin. Code § [DHS 106.02\(9\)](#). Providers are required to produce or submit documentation, or both, to the Wisconsin Department of Health Services (DHS) upon request. Per Wis. Stat. § [49.45\(3\)\(f\)](#), providers of services shall maintain records as required by DHS for verification of provider

QUICK LINK

[ForwardHealth Portal
Demographic Maintenance
Tool User Guide \(PDF\)](#)

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claims for reimbursement. DHS may audit such records to verify the actual provision of services and the appropriateness and accuracy of claims. DHS may deny or recoup payment for services that fail to meet these requirements. Refusal to produce documentation may result in denial of submitted claims, recoupment of paid claims, application of intermediate sanctions, or termination from the Medicaid program.

IN THE KNOW

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This Update was issued on 07/29/2024 and information contained in this Update was incorporated into the Online Handbook on 08/01/2024.

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/.