

# ForwardHealth **UPDATE**

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## **EXPANDED SCOPE OF PRACTICE FOR SUBSTANCE USE DISORDER PROVIDERS**

Effective December 1, 2022, ForwardHealth is expanding coverage for substance use disorder (SUD) services performed by licensed professional counselors in training, licensed marriage and family therapists in training, and psychologists (working towards full licensure) enrolled as qualified treatment trainees (QTTs). In addition, ForwardHealth is no longer requiring certified psychotherapists to receive a substance abuse counselor (SAC) certification to perform SUD services. This is in accordance with Wis. Admin. Code ch. DHS [75](#) and 2021 Wisconsin Act 222.

### **Qualified Treatment Trainees**

Previously, QTTs were only allowed to perform SUD services in Wis. Admin. Code ch. DHS 35-certified facilities. Effective for dates of service (DOS) on and after December 1, 2022, the scope of practice for QTTs has been expanded to include services performed in Wis. Admin. Code ch. DHS 75-certified facilities. The provider must have

## **AFFECTED PROGRAMS**

BadgerCare Plus, Medicaid

## **TO**

Master's-Level Psychotherapists,  
Qualified Treatment Trainees,  
HMOs and Other Managed Care  
Programs

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The information provided in this ForwardHealth Update is published in accordance with Wis. Admin. Code ch. DHS 75 and 2021 Wisconsin Act 222.

the requisite knowledge, skills, training, and experience needed to treat the member’s identified needs. Providers currently enrolled as QTTs with Wisconsin Medicaid will not be required to take any action for these changes to be in effect.

**“ Effective for DOS on and after December 1, 2022, the scope of practice for QTTs has been expanded to include services performed in Wis. Admin. Code ch. DHS 75-certified facilities.**

### Certified Psychotherapists

Effective for DOS on and after December 1, 2022, ForwardHealth will allow all certified psychotherapists enrolled in Wisconsin Medicaid to provide both mental health and SUD treatment services. There will no longer be a distinction between certified psychotherapists and certified psychotherapists with SAC certification. These providers will now be enrolled as a single specialty: certified psychotherapist.

Advanced practice social workers (APSWs) and independent social workers (ISWs) with the SAC certification may continue to render and bill for both mental health and SUD treatment services. In addition, APSWs and ISWs who do not have an SAC certification will now be able to render both mental health and SUD treatment services. The provider must have the requisite knowledge, skills, training, and experience needed to treat the member’s identified needs. Providers currently enrolled with Wisconsin Medicaid will not be required to take any action for these changes to be in effect.

ForwardHealth has removed SAC from the provider title to align with 2021 Wisconsin Act 222 and eliminate confusion since SAC certification is no longer required for these licensure types.

## THE KEY MESSAGE

All certified psychotherapists enrolled in Wisconsin Medicaid may provide both mental health and SUD services.

| IF ...  | THEN ...   |
|---|--|
| The provider is an APSW without SAC or ISW without SAC, | They may provide both mental health and SUD treatment services. Their specialty will remain certified psychotherapist.   |
| The provider is an APSW with SAC or ISW with SAC,       | Their specialty’s name will change from certified psychotherapist with SAC to certified psychotherapist. They may continue to provide both mental health and SUD treatment services. |

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## Supervision Requirements Reminder

Per Wis. Admin. Code §§ DHS [35.14](#), [75.18\(2\)](#), [105.22](#), and [105.23](#), ForwardHealth expects providers to adhere to all supervision requirements for the clinical setting in which they practice.

## 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 claims for reimbursement. DHS may audit such records to verify 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.

## Information Regarding Managed Care Organizations

This Update applies to SUD services that members receive on a fee-for-service basis and through BadgerCare Plus, Medicaid SSI, and other managed care programs. For information about managed care implementation of the updated policy, contact the appropriate managed care organization (MCO). MCOs are required to provide at least the same benefits as those provided under fee-for-service arrangements.

## REMINDER

Providers currently enrolled with Wisconsin Medicaid will not be required to take any action for these changes to be in effect.

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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/).