



**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:** September 7, 2023  
**RE:** Interim Guidance Regarding Claiming for Therapy & Assessment 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 and LPHA assessments. While the Department awaits additional long-term guidance from DHCS, this memo provides directions on how to code for any therapy and assessment services provided by graduate student interns.

**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

In addition, for service notes in draft, instruct graduate students to change the procedures codes from non-billable to appropriate CPT/HCPC code for therapy services rendered and sign/submit service notes.

**B. Procedure Code for Assessment Services Rendered by Graduate Student Interns**

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

- Assessment Contribution non-LPHA
- Assessment LPHA

For programs using SmartCare: Please ask your graduate student interns to ensure they have access to these codes.

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