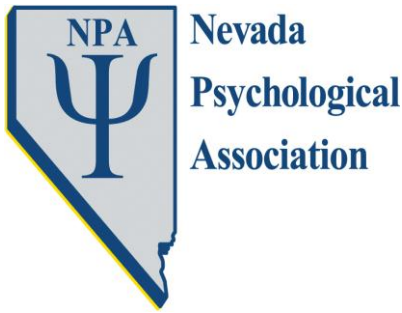




Advocating for Psychologists in Nevada
Nevada Psychological Association

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Nevada Department of Health and Human Services
4126 Technology Way, Room 100
Carson City, NV 89706-2009
Attn: Mike Willden, Director, DHHS
Attn: Charles Duarte, Administrator, DHCFP

March 1, 2013

Dear Mr. Willden and Mr. Duarte,

I am writing on behalf of the Nevada Psychological Association (NPA) to propose a change in the Medicaid Services Manual Chapter 400, which would include Pre-Doctoral Psychological Interns as Qualified Mental Health Professionals (QMHPs). Currently, Licensed Physicians, Physician Assistants and Psychologists are considered QMHPs as well as well supervised Postdoctoral Psychological Assistants, Licensed Marriage and Family Therapy (LMFT) Interns, and Licensed Clinical Social Work (LCSW) Interns.

The current definition of QMHPs cut out Pre-Doctoral Psychology Interns, a portion of highly trained individuals who could be providing quality mental health services to Medicaid populations. Psychology training differs from that of Masters level professionals. Doctoral students in psychology must successfully complete a full-time, one-year, supervised pre-doctoral internship to meet graduation requirements for their Ph.D. or Psy.D. The internship is parallel to the residency for physicians; however, physicians receive their M.D. or D.O. degree immediately prior to the start residency year. Before the start of internship, Pre-Doctoral Psychological Interns have completed all required coursework for the doctoral degree which involves 4-5 years of full time class work and research activity, as well as several years of supervised clinical practicum (typically a minimum of 1200 direct service hours). They have also completed a Master's Degree (or equivalent) and many have proposed their doctoral dissertations. The internship represents the capstone clinical training requirement for the doctorate.

State licensing requirements and the American Psychological Association (APA) mandate that Pre-Doctoral Psychological Interns must receive weekly clinical supervision equivalent to a minimum of two hours of individual and two hours of group. Their supervisors must have been licensed in Nevada for at least three years and are subject to the provisions of [NAC 641.080](#) (subsection 4, paragraph b, subsection 7) concerning his/her physical presence on the premises where the internship occurs; and [NAC 641.1563](#) to [641.157](#), inclusive regarding qualifications of supervisors. Pre-Doctoral Psychological Interns continue to be affiliated with their host university doctoral programs, and thus are also supervised and monitored by the university program's Director of Clinical Training.

With Medicaid expansion on the horizon, increasing the availability of well-qualified mental health providers could not be timelier. Currently, we have less than 400 licensed psychologists in the state of Nevada and less than 10 Pre-doctoral Psychology Interns. A major reason for this scarcity is that we are not retaining psychology doctoral students from UNLV or UNR for internships (nearly all interns are forced to go out of state) nor are we attracting interns to Nevada, because we have only two formal internship programs. Prior to 2010, there was only one formal internship site in the entire state, the Sierra Nevada VA. So, in 2010, we created the NPA Training Consortium (NPATC) a 501(c)3 non-profit subsidiary corporation of NPA. However, potential training sites and supervising psychologists are reluctant to take on the financial responsibility of an intern as interns cannot be reimbursed for their services through Medicaid. Pre-doctoral Psychology Interns already bill for Medicaid services in numerous states including Alabama, Idaho, Massachusetts, Minnesota, New York, Utah, and Wyoming. Many other states have special arrangements between Medicaid and certain hospitals/organizations. For example, as a supervised Pre-doctoral Psychology Intern at the University of Chicago Medical Center, I was able to provide assessment and therapy services for the Medicaid population and bill for my services.

In conclusion, Pre-Doctoral Psychology Interns are subject to strict supervision and training requirements and typically have more formal education and training than Master's level interns (who are considered QMHPs). Thus, Pre-Doctoral Psychology Interns should be considered QMHPs and, under appropriate supervision, be able to bill under the psychotherapy and psychological testing codes. This will allow for more training sites and opportunities in Nevada that will attract and retain more interns, thus providing more qualified providers to serve our growing communities. These interns are then likely to remain in our state and become resident Licensed Psychologists. I do hope that you both strongly consider this win-win situation for all!

NPA would like to arrange a meeting with DHHS so that we can discuss and proceed with the process of amending Medicaid Chapter 400 to include Pre-doctoral Psychology Interns as QMHPs. Please contact me at your earliest convenience to arrange such a meeting at (702) 810-4683 or Lindsey.Ricciardi@gmail.com. NPA appreciates your consideration of this important matter.

Respectfully,

Lindsey Ricciardi, Ph.D.
Licensed Psychologist
President, Nevada Psychological Association