



COMMONWEALTH OF MASSACHUSETTS
Office of Consumer Affairs and Business Regulation
DIVISION OF INSURANCE

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COMMISSIONER OF INSURANCE

BULLETIN 2023-03

To: All Commercial Health Insurers, Blue Cross and Blue Shield of Massachusetts, Inc.,
and Health Maintenance Organizations

From: Gary D. Anderson, Commissioner of Insurance 

Date: January 4, 2023

Re: Clinicians Working Toward Licensure and Practicing under Supervision of Licensed
Professional

The Division of Insurance (“Division”) issues this Bulletin 2023-03 to Commercial Health Insurers, Blue Cross and Blue Shield of Massachusetts, Inc., and Health Maintenance Organizations (“Carriers”) to identify the Division’s expectations regarding Carriers’ requirements to provide health care coverage for certain clinicians who are working toward licensure while practicing under the supervision of a licensed professional. The Division issues this Bulletin pursuant to Sections 50, 54, 56, and 59 of Chapter 177 of the Acts of 2022, which amend M.G.L. c. 175, §47B; M.G.L. c. 176A, §8A; M.G.L. c. 176B, §4A; and M.G.L. c. 176G, §4M (“Statutes”). These amendments to the above Statutes are effective as of November 8, 2022.

The existing law defines a “licensed mental health professional” to include “a licensed physician who specializes in the practice of psychiatry, a licensed psychologist, a licensed independent clinical social worker, a licensed certified social worker, a licensed mental health counselor, a licensed supervised mental health counselor, a licensed psychiatric nurse mental health clinical specialist, a licensed psychiatric mental health nurse practitioner, a licensed physician assistant who practices in the area of psychiatry, a licensed alcohol and drug counselor I, as defined in section 1 of chapter 111J, or a licensed marriage and family therapist within the lawful scope of practice for such therapist.” The Statutes modify the definition to add “a clinician practicing under the supervision of a licensed professional and working towards licensure in a clinic licensed under chapter 111.”

Carriers will perform, as necessary, any and all needed updates and modifications, especially those to reimbursement systems, to enable payment for covered behavioral health services when delivered

by those clinicians who are practicing under the supervision of a licensed professional and working toward licensure in a clinic licensed under chapter 111. Carriers are also directed to take all appropriate steps to update websites and coverage materials to notify covered persons of behavioral health coverage for services provided by these individuals.

Carriers Acting As Administrators

When Carriers are acting as administrators for employment-sponsored non-insured health benefit plans, the Division expects Carriers to encourage plan sponsors to take steps that are consistent with the provisions of this Bulletin 2023-03.

If you have any questions about this Bulletin, please contact Kevin Beagan, Deputy Commissioner for the Health Care Access Bureau, at (617) 521-7323.
