



Quality Assurance Bulletin

Quality Assurance Unit

County of Los Angeles – Department of Mental Health

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CALIFORNIA BOARD OF BEHAVIORAL SCIENCES' 90-DAY RULE (Revised 6/24/24)

This Bulletin provides guidance related to the California Board of Behavioral Sciences' (BBS) 90-day rule which allows applicants for registration as an Associate Marriage and Family Therapist, Associate Professional Clinical Counselor, or Associate Clinical Social Worker (Associate), whose Associate application is received within 90 days of the qualifying degree award date, to count supervised experience gained during the window of time between the degree award date and the issue date of the Associate registration number. The goal of the 90-day rule is to secure public protection by ensuring that applicants who are applying for an Associate registration were fingerprinted by the employer. Per Behavioral Health Information Notice (BHIN) 24-0023 the State Department of Health Care Services (DHCS) will honor the 90-day rule and allow practitioners to provide services as if they are registered while they wait for their registration number after the completion of their Live Scan. DHCS has confirmed that Associates may be considered "registered" during this 90-day period and claim Medi-Cal for assessment and therapy services. In the event the BBS application is not approved by BBS, all services provided by the candidate provided while pending BBS registration are not Medi-Cal reimbursable .

Effective January 8, 2024, Associates meeting all requirements of the 90-day rule who have completed their Live Scan and are awaiting their registration number may provide and claim Medi-Cal for assessment and therapy services. Post-degree hours and claiming to Medi-Cal for assessment and therapy services may only be counted as of the "Live Scan Transaction Completed" date recorded at the bottom of the Request for Live Scan Service form. To begin claiming for these services, Associates must submit proof of registration to Quality Assurance at NetworkAdequacy@dmh.lacounty.gov and be properly set up in NAPPA with the following:

- Enter "Associate [Clinical Social Worker, Marriage and Family Therapist, Professional Clinical Counselor]" in the Category field with the corresponding taxonomy code;
- The "Taxonomy Effective Start Date" may be the first day eligible to count hours per the 90-day rule or January 8, 2024, whichever is later;
- Enter "Unavailable" in the license/registration/certification field/indicate pending per 90-day rule.

As soon as the registration number is received by the practitioner, the registration number must be emailed to NetworkAdequacy@dmh.lacounty.gov and the Quality Assurance team will update the information in NAPPA.

It is expected that the BBS' [90-day rule document](#) be carefully reviewed along with the [FAQs](#) to ensure all requirements are met to claim for services.

If contracted or directly-operated providers have questions related to this Bulletin, please contact the QA Policy & Technical Development team at QAPolicy@dmh.lacounty.gov.

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