

## MFT Program Policy on Legal Billing

### Policy Availability

The **Policy on Legal Billing** is available to the public via the [MFT Homepage > Accreditation > Policies and Handbook](#).

### Purpose

This policy outlines the legal, ethical, and professional billing procedures for therapy services provided by student therapists at FamilyWorks, Valdosta State University's campus-based family therapy clinic in Georgia. The clinic functions as both a training site for students enrolled in the Master of Science program in Marriage and Family Therapy and a family therapy clinic providing therapeutic services to those who seek them. All therapy services are delivered under the supervision of licensed faculty members in accordance with Georgia law and professional board rules.

### Policy Application

This policy applies to:

- Graduate student therapists in training (pre-licensed, pre-degree)
- Licensed faculty supervisors
- Clinic administrators and billing personnel
- FamilyWorks clients

### Client Informed Consent

All clients must sign an informed consent that includes:

- mention of the trainee status of the student therapist,
- disclosure that we do not bill insurance for our services and that payment, in any, must be made in cash or electronically to the MFT Program Foundation
- acknowledgment that sessions may be recorded or observed for supervision purposes.

### Student Therapist Billing Restrictions

- under Georgia law, student therapists who are not licensed may not bill insurance or represent themselves as independent providers.
- student therapists are not permitted to obtain NPI numbers or enroll as billing providers with third-party payers.
- all services by student therapists must be provided under supervision and cannot be billed directly to insurance under the student's or the supervisor's name.

### Private Pay

The clinic offers reduced-fee private pay services by student therapists. Clients must be informed via the Program website and informed consent that:

- services are provided by graduate students under supervision.
- these sessions cannot be submitted to insurance for reimbursement.
- FamilyWorks does not issue superbills for services provided by students.

This policy addresses Standards V12.5, Eligibility Criterion E: Accuracy and Program Transparency in Policies and Publications and Standard I: Outcome-Based Education Framework and Environmental Support, KE I-C: Plan for Assessing Environmental Supports. Updated Fall 2025. Scheduled for update Fall 2029 or sooner as necessary.

### Documentation and Supervisor Oversight

All clinical documentation/case notes must:

- identify the **student as the provider** and the faculty member as the **supervisor**
- Supervisors must maintain **clinical oversight and availability**, in line with Georgia Composite Board rules.

### Prohibited Practices

It is a **violation of Georgia law and university policy** to:

- submit insurance claims using a student's name or NPI
- falsely represent student therapists as licensed providers
- bill under a supervisor's name without adequate clinical involvement or presence
- issue documentation (e.g., superbills) that misrepresent the student's role.

### Compliance with Georgia Regulations

This policy adheres to:

- [O.C.G.A. Title 43, Chapter 10A](#), which addresses the exception for practicing by unlicensed students in training and under supervision.
- Rules and Regulations of the Georgia Composite Board, including supervision requirements.
- HIPAA and FERPA for privacy and confidentiality of client and student records.

### Training and Quality Assurance

- Faculty supervisors and the Clinical Coordinator are responsible for ensuring clinical and billing compliance.
- The Clinical Coordinator will conduct regular audits of documentation and billing.
- Any suspected violations will be addressed through the university's academic or professional conduct process and, if necessary, reported to the appropriate licensing board.