

This document is intended to clarify questions about requirements for limited-licensed psychologists, or LLPs, and licensed marriage and family therapists, or LMFTs.

Questions and answers

Questions	Answers			
	Blue Cross commercial		BCN commercial and BCN Advantage	
	LLP / LMFT	Other limited-licensed providers	LLP / LMFT	Other limited-licensed providers
Can the provider enroll directly?	Yes	No	Yes	No
Can the provider be part of a participating group?	Yes	Not applicable	Yes	Not applicable
What type of contract can be held by the provider?	Individual	Not applicable	Group	Not applicable

Frequently asked questions: LLPs and LMFTs

For Blue Cross commercial, Blue Care Network commercial and BCN AdvantageSM

Revised September 2026

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In which networks can the provider participate?	Traditional Note: PPO Trust members can be seen only if the provider participates with the Traditional network. For providers who do not participate with the Traditional network, the services are considered out of network.	Not applicable	BCN commercial and BCN Advantage	Not applicable
Can the provider bill under supervision?	Yes Note: If billing under a fully licensed psychologist or under a physician (MD/DO), the supervising provider's NPI must be used and the appropriate modifier is required.		No	Yes, but the provider must be in an accredited facility and: • LLMSWs must work under an LMSW. • LLPCs must work under an LPC or LP. • LLMFTs and TLLPs must work under an LP. The medical record must include the signature and credentials of the supervisor, as applicable.

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Is a modifier required?	No, for direct billing. Yes, when billing under supervision. Use modifiers HO and SA⁽¹⁾ .	Yes. Use the appropriate modifier (HO or AJ) . When billing under supervision, also include modifier SA⁽¹⁾ . LLPCs, LLMFTs, TLLPs: modifier HO Note: LPCs must also use modifier HO. LLMSWs: modifier AJ Note: LMSWs must also use modifier AJ.	Yes. Use modifier HO .	Yes, but the provider must be in an accredited facility. Use the following: • LLPCs, LLMFTs, TLLPs: modifier HO • LLMSWs: modifier AJ

⁽¹⁾ For dates of service Sept. 1, 2026, through Feb. 28, 2027, limited licensed clinicians delivering services incident-to a supervising clinician in a professional setting must use modifier SA on the claim in addition to any applicable modifier (HO or AJ). For more information, refer to our incident-to reimbursement policy.

To review our incident-to reimbursement policy, do the following:

1. Within our payer space, click on the *Resources* tab and then click on *Secure Provider Resources (Blue Cross and BCN)*. ([Learn how to access our provider portal payer space.](#))
2. Under the Billing and Claims tab, click on *Medical and Reimbursement Policies* from the drop-down menu, and then choose *Blue Cross and BCN Reimbursement Policies*.