



White Paper: Navigating the CYBHI Fee Schedule: Opportunities & Safeguards for California School Counselors

October, 2025

Introduction

The [**California Youth Behavioral Health Initiative \(CYBHI\) Fee Schedule**](#) marks a major policy innovation in funding behavioral health services on school campuses. For the first time, Local Educational Agencies (LEAs) may bill health insurance plans for eligible mental health services delivered directly to students. This change is designed to expand access to critical supports while aligning schools with statewide strategies to address the youth mental health crisis. By establishing a sustainable reimbursement pathway, the fee schedule takes an important step toward closing service gaps and ensuring students receive timely care.

School counselors play a central role in this work. As credentialed professionals, they bring expertise in academic achievement, career development, social-emotional learning, and mental health. Positioned at the intersection of student well-being and school success, they provide both preventive and treatment services. Some school counselors have raised concerns about certain services not aligning within their areas of expertise; many LEAs have addressed these concerns and now submit claims alongside other eligible providers. These include school psychologists, social workers, Marriage and Family Therapists, Licensed Clinical Psychologists, and Certified Wellness Coaches.

This White Paper examines the role of school counseling professionals within the CYBHI Fee Schedule with a focus on the shared responsibilities of school administrators and school counselors in collaboration on determining which services align within the school counselors' scope of practice and which do not. Central to this discussion is the obligation of school counselors to follow state policies and laws, guiding documents, as well as ethical consideration. Additional considerations include safeguarding student privacy and ensuring revenue priorities do not overshadow the delivery of comprehensive, multi-tiered supports that remain vital to student success.

CA School Counselors Scope of Practice: [The California Standards for the School Counseling Profession](#) (CSSCP) define school counselors' scope of practice. Alignment with the CYBHI Fee Schedule is most evident in Standard 2: School-Based Mental Health and Standard 6: Creating and Maintaining Safe and Inclusive Environments for Student Wellbeing. Other standards may also apply depending on the services provided, underscoring the need for implementation that is contextually grounded and profession-affirming.

Understanding the CYBHI Fee Schedule

The CYBHI Fee Schedule is the first program in the nation that allows schools to bill health insurance for behavioral health services. It recognizes Pupil Personnel Services (PPS) professionals: school counselors, school psychologists, and school social workers, as essential school-based professionals within California's behavioral health system. While these professionals remain part of the education community, this expanded identity reflects their dual role as both educators and mental health providers. This shift was made possible by the passage of the *Every Student Succeeds Act* in 2015, which formally identified PPS professionals as "School-Based Mental Health Providers."

The CYBHI Fee Schedule is organized into four billing categories:

1. Screenings and Assessments: Covers evaluations of a student's mental health needs
2. Case Management: Supports coordination across families, providers, & systems
3. Treatment Services: Includes individual, group, and family counseling;
4. Psychoeducation: which focuses on early supports & skill-building.

CYBHI Billing Categories and Eligible Professions	
 Focus:	Psychoeducation (formerly "Preventive/Group Interventions") Focus: Early intervention, skill-building groups, wellness coaching, classroom-based workshops. Eligible: PPS School Counselors (since Jan 2024), Certified Wellness Coaches (under PPS supervision), LMFTs, LCSWs, Psychologists, LPCCs
 Eligible	Screenings & Assessments (formerly "Assessment") Focus: Initial mental health screenings, diagnostic assessments, risk/safety assessments, and progress evaluations Eligible: PPS School Counselors, Psychologists, LCSWs, LMFTs, LPCCs
 Focus:	Treatment (formerly "Therapeutic Services") Focus: Individual, group, and family counseling: evidence-based interventions, trauma-informed therapy Eligible: PPS School Counselors, LMFTs, LCSWs, Psychologists, LPCCs
 Eligible	Case Management / Care Coordination (formerly "Case Management") Focus: Connecting students and families to outside services, coordinating with Medi-Cal plans, follow-up, referral tracking Eligible: PPS School Counselors, Social Workers, Psychologists, LMFTs, LPCCs



Licensed and certified professionals may bill at levels consistent with applicable laws and training standards, ensuring alignment with their defined scopes of practice across the four service categories. By integrating these providers into the billing framework, California has established both a sustainable funding stream and a structured mechanism to clarify each profession's service capabilities and limitations. Although the CYBHI Fee Schedule is primarily designed as a reimbursement mechanism for school-based mental health services, it also elevates the role of these professionals within the broader mental and behavioral health community, enabling districts to expand staffing, reduce caseloads, and strengthen student support services.

Opportunities

Because reimbursement dollars are unrestricted, the CYBHI Fee Schedule brings significant opportunities for schools and districts:

- **Expanded Resources:** By tapping into CYBHI Fee Schedule, LEAs can expand behavioral health services and reduce reliance on limited general fund dollars.
- **Integration of Supports:** Billing provides a pathway for schools to deepen partnerships with county behavioral health and managed care organizations, improving continuity of care for students.
- **Recognition of School-Based Services:** Inclusion of school counselors and related professionals in the Fee Schedule signals state recognition of the vital role schools play in delivering accessible, equity-driven care.
- **Revenue Sharing Potential:** When billing revenue is reinvested into the school counseling program, such as hiring additional staff, providing clerical support, or funding professional development, it reinforces school counselor engagement and builds a stronger system of care.
- **Expansion of Mental Health Supports:** Revenue can be used to add mental health professionals (such as additional school counselors, and social workers), expand wellness centers, and fund prevention programs that strengthen the overall school-based mental health system.



Key Challenges

Despite these benefits, several implementation factors must be carefully navigated:

- **Administrative Burden:** Billing requires significant documentation, coding, and compliance. Without appropriate administrative and technological infrastructure and documentation policies, school counselors' risk being pulled away from their broader responsibilities.
- **Scope of Practice:** Under California Education Code § 49600 and the California Standards for the School Counseling Profession (2023), school counselors provide comprehensive support across academic, college/career, and social-emotional domains. Over-emphasis on billable activities risks narrowing practice.
- **Student Privacy:** Billing requires data collection and information sharing. Protecting student confidentiality in compliance with FERPA and HIPAA is essential.
- **Pressure to Maximize Revenue:** Districts may feel pressure to prioritize billable services, potentially placing counselors in a difficult position when organizational goals conflict with professional standards.
- **Equitable Revenue Allocation:** If generated revenue is not transparently shared to support counseling services, counselors may feel exploited rather than supported by the program.
- **Technology:** Establish standardized documentation processes that integrate billing and coding with student data systems to minimize duplication, and ensure full regulatory compliance.



Guiding Principles for Implementation

To ensure the Fee Schedule strengthens—rather than undermines—the school counseling profession, administrators and counselors can act on the following principles:

1. Protect Comprehensive Roles

Ensure school counselors maintain their full scope of responsibilities, consistent with CEC § 49600 and the CSSCP. Billing opportunities should enhance, not replace, the multi-tiered continuum of supports.

2. Build Administrative Infrastructure

Designate billing specialists or central office staff to handle documentation and compliance. Counselors should not carry the primary responsibility for paperwork and coding.

3. Clarify Roles and Expectations

Develop local policies and agreements that outline when and how counselors' services intersect with billable activities, preserving professional boundaries.

4. Safeguard Student Privacy

Create clear protocols for data use and consent that align with FERPA, HIPAA, and ethical standards of the counseling profession.

5. Ensure Revenue Sharing and Reinvestment

Adopt policies to direct a portion of generated revenue back into the counseling program—through hiring additional counselors, expanding mental health supports, providing clerical assistance, and funding professional development. Transparent reinvestment reinforces counselor buy-in and strengthens long-term sustainability.



Action Steps for Administrators

- Consider conducting a needs assessment to identify which behavioral health services are most appropriate for billing without disrupting comprehensive school counseling programs.
- Consider crosswalking these services to simple, easy to use documentation templates that simplify billing and safeguard counselors for compliance.
- Consider implementing technology solutions to eliminate duplication of documentation and pass policies that reduce the need to document in more than one system.
- Consider providing professional development for administrators and school counselors on CYBHI requirements, compliance, and the school counselor's role.
- In small, rural districts, consider partnering with county behavioral health agencies to share administrative responsibilities and ensure cross-system alignment.
- Consider establishing revenue-sharing agreements so that a meaningful percentage of funds directly supports school counseling staff, clerical support, expanded mental health services, and professional growth opportunities.
- Consider monitoring impact by collecting data on counselor time use, student outcomes, and billing revenue to ensure balance is maintained.

Conclusion

The CYBHI Fee Schedule represents a promising opportunity to sustain and expand school-based behavioral health services. With thoughtful implementation, districts can leverage new funding while preserving the comprehensive, equity-driven role of school counselors. Revenue-sharing and reinvestment strategies are critical: by directing new funds back into school counseling programs, hiring additional staff, & expanding mental health supports, schools can reduce administrative burden, increase service capacity, while ensuring the Fee Schedule is a catalyst for stronger student-centered systems.



References

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