

Clinical Services TIPS

Treatment, Interventions, Protocols, and Suggestions

Purpose: TIPS provide guidance for CBO and County Specialty Mental Health Services (SMHS) and Drug Medi-Cal Organized Delivery System (DMC-ODS) providers to enhance service quality and ensure compliance with Alameda County agreements and California regulations.

Interactive Complexity

1. What is Interactive Complexity?

Interactive Complexity (CPT Code 90785) is an add-on code used when communication difficulties complicate the delivery of certain mental health or substance use disorder activities. It can only be reported in conjunction with an appropriate primary code.

2. Criteria for Billing Interactive Complexity

Interactive Complexity can be claimed when at least one of the following factors is present during a billable face-to-face service:

- a) The need to manage maladaptive communication (related to, e.g., high anxiety, high reactivity, repeated questions or disagreement) among participants that complicates delivery of care.
- b) Caregiver emotions or behavior that interferes with the caregiver's understanding and ability to assist in the implementation of the treatment plan.
- c) Evidence or disclosure of a sentinel event/Unusual Occurrence (UO) and mandated report to a third party (e.g., abuse or neglect with report to state agency) with initiation of discussion of the sentinel event and/or report with patient and other visit participants.

- d) Use of play equipment or other physical devices to communicate with the patient to overcome barriers to therapeutic or diagnostic interactions between the physician or other qualified health care professional and a patient who has not developed, or has lost, either the expressive language communication skills to explain their symptoms and response to treatment, or the receptive communication skills to understand the physician or other qualified health care professional if he/she were to use typical language for communication.¹ *Example: a session involving a child where the therapist uses dolls, drawing, or puppets to overcome barriers with communication.*

3. Documentation Requirements

The following elements must be documented in the progress note:

- a) **Primary Service:** Document the primary service provided (e.g., individual therapy, assessment).
- b) **Complexity Factor:** Explicitly state the factor(s) that made the session complex using the criteria listed above.
- c) **Clinical Justification:** Briefly describe how the complexity impacted the session, and the efforts made to address it.

Examples:

- *“Interactive Complexity was added to this individual therapy session due to the adult client’s escalated emotional response related to the recent assault of his mother, requiring more complex interventions and de-escalation techniques to manage the communication.”*
- *“Interactive Complexity was added to this family therapy service due to the parent’s strong emotional response to their child’s anger outbursts, requiring multiple de-escalation interventions to manage the communication.”*

¹ AMA CPT Code Book, 2025

- *“Interactive Complexity was added to this assessment service due to the child’s limited communication skills associated with their autistic spectrum disorder, requiring use of play equipment to communicate with the child.”*

4. Billing Guidance

The following elements are necessary to appropriately claim and bill for the Interactive Complexity add-on code.

- a) **Add-On Code:** CPT Code 90785 is an add-on code and cannot be billed alone. It must be used with a primary service code such as 90832 (30-minute therapy) or 90791 (Assessment).
- b) **Lockouts:** Interactive complexity (90785) cannot be used with Sign Language and Oral Interpretation Services (T1013) or Psychotherapy for Crisis (90839 and 90840) codes.
- c) **Eligible Staff:** Only licensed or license-eligible clinicians can bill for services involving Interactive Complexity.
- d) **Time Requirements:** Interactive Complexity does not add time to the session but reflects the complexity of the interaction by supplementing reimbursement of the service. There is no time associated with this code.
- e) **SmartCare Billing:** Enter the Interactive Complexity CPT Code 90785 alongside the primary service code in SmartCare.

6. When in Doubt

If you are unsure whether a session qualifies for Interactive Complexity, consult with your supervisor before billing.

Resources

- AMA CPT Code Book, 2025
- [DHCS Medi-Cal Billing Manuals](#)
- [ACBHD Documentation Manual and FAQ](#), see Section 7
- [SmartCare Procedure Code Tables](#), see Section 13
- [CMS Interactive Complexity Guidance](#)

- [APA Services Interactive Complexity](#)

Disclaimer: This document complements, but does not replace, CBO-specific policies. Staff must comply with evolving standards, laws, and organizational requirements. Guidance may change to reflect regulatory or contractual updates.

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