ACBHD SUD Scope of Practice Reference Guide

All Medi-Cal services must be under the direction of a licensed LPHA. Registered, waivered, and non-licensed staff must meet all supervision requirements per their credentialing entity. Staff must work within their scope of practice, training, and ability.

KEY	Licensed Practitioners of Healing Arts (LPHAs)						

[1] OTP medical director or licensed MD/DO only
[2] Requires training in detoxification services.
[3] Prior to conducting ASAM assessments, LPHAs and SUD Counselors must complete the two required ASAM training modules.
[5] Requires licensed LPHA co-signature through co-signature or separate note.
[8] When completed by a NP/PA, requires licensed physician review and concurrence (9 CCR § 10270).
	LICENSED BEHAVIORAL HEALTH PROVIDERS
	• Licensed Clinical Psychologists
	  • Psy.D. - Licensed
	  • Ph.D. - Licensed
	• LCSW
	• LMFT*
	• LPCC/LPCC-F*
		REGISTERED BEHAVIORAL HEALTH PROVIDERS
		• Waivered Psychologists
		  • Ph.D.- Waivered
		  • Psy.D.-Waivered
		• AMFT
		• ASW
		• APCC
		• MFT–Candidate
		• MSW–Candidate
		• PCC–Candidate
		Licensed LPHA co-signature required for diagnosis. Co-signature recommended for other activities.
			PHYSICIANS
			A physician licensed in the State of California
			• Medical Doctor of Medicine (MD)
			• Doctor of Osteopathy (DO)
			• Post-Graduate Trainee License (PTL) - PTLs must be under the supervision of licensed physicians.
			OTHER MEDICAL PROVIDERS
			• Nurse Practitioners (NP, NP-F, PMHNP)
			• Physician Assistants (PA)
			All medical services provided by PA and NPs must be under supervision per their credential.
				PHARMACISTS
				• Registered Pharmacists (RPh)
				• Advanced Practice Pharmacists (APh)
				Pharmacists must operate under a collaborative practice agreement protocol with psychiatric supervision per their credential.
				For additional information: 501-1-1 ACBHD's Clinical Psychiatric Pharmacist Scope of Practice for Medication Therapy Management Policy
					REGISTERED NURSES
					• Registered Nurse (RN)
					RNs can direct treatment, however, cannot prescribe medications. Medical services provided by RNs must be under supervision per their credential.
					Co-signatures recommended.
						OTHER NURSING
						• Licensed Vocational Nurses (LVN)
						• Licensed Psychiatric Technician (LPT)
						LVNs and PTs, must be under the direct supervision of a licensed practitioner, such as Physicians, NPs, RNs. RNs can provide counseling but not psychotherapy
						Co-signatures recommended.
							OCCUPATIONAL THERAPISTS
							• Licensed Occupational Therapist (LOT)

Care Coordination	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Care/Discharge Planning	Yes	Yes	Yes	No	Yes	Yes	Yes
Clinician Consultation	Yes	No	Yes	Yes	Yes	Yes	No
Contingency Management	Yes	Yes	Yes	Yes	Yes	Yes	Yes
DSM SUD Diagnosis	Yes	Yes [5]	Yes	No	No	No	No
Family Therapy (90846/7)	Yes	Yes	Yes	No	No	No	No
Ind/Grp Counseling	Yes	Yes	Yes	No	Yes	No	Yes
Medication Support Services	No	No	Yes	Yes	Yes	Yes	No
Medication Administering	No	No	Yes	Yes	Yes	Yes	Yes
Medication Dispensing	No	No	Yes	Yes	Yes	No	No
Prescribing (non-OTP)	No	No	Yes	Yes	No	No	No
Observation (WM) [2]	Yes	Yes	Yes	Yes	Yes	Yes	Yes
OTP Physical & Medical Necessity	No	No	Yes [8]	No	No	No	No
OTP Med. Ordering/Prescribing	No	No	Yes [1]	No	No	No	No
OTP Med. Psychotherapy	No	No	Yes [1]	No	No	No	No
Patient Education	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Peer Support Services	No	No	No	No	No	No	No
Recovery Services	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Residential Day	Yes	Yes	Yes	Yes	Yes	Yes	Yes
SUD/ASAM Assessment [3]	Yes	Yes	Yes	Yes	Yes	Yes	Yes
SUD Crisis Intervention Services	Yes	Yes	Yes	No	Yes	Yes	Yes
Students/Clinical Trainees [9]	**Clinical Trainees:** Clinical trainees for any of the above designations are allowed when the individual is actively enrolled in a corresponding post-secondary educational program. Generally, scope of practice standards for clinical trainees are equivalent to the credential/license they are pursuing (e.g., a MSW student can perform similar functions as an ASW/LCSW). All clinical trainees must be supervised by licensed (not registered/waivered) practitioners. See applicable licensing board for additional oversight and supervision requirements (e.g., CA BBS, CA Board of Psychology, CA, CA Board of Nursing). **All clinical documentation completed by clinical trainees requires licensed LPHA co-signature. First year mental health graduate students DO NOT have the scope of practice to diagnose and may not establish a MH or SUD diagnosis, even with a co-signature.**						

***** Medicare does not accept pre-graduation hours towards licensure for LMFTs/LPCCs. Providers billing Medicare must ensure LMFTs/LPCCs meet Medicare requirements. See DMC-ODS Billing Manual (pg. 55) for more information.

[9] As of publication of this guide, ACBHD has not fully implemented Clinical Trainee services in its DMC-ODS programs. Until fully implemented, guidance is informational only.

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KEY	Additional Provider Types		
[2] Requires training in detoxification services. [3] Prior to conducting ASAM assessments, LPHAs and SUD Counselors must complete the two required ASAM training modules. [4] Requires licensed, registered, or waivered LPHA co-signature. [6] Cannot complete an ASAM assessment but may be able to conduct other assessment activities or gather information for use in the ASAM assessment. [7] Certified Medi-Cal Peer Support Specialists may perform a variation of this activity within their training and experience and report it with either the H0025 (group) or H0038 bundled codes. See BHIN 22-026 for more information about Medi-Cal Peer Support Service activities.	**MEDICAL ASSISTANTS** •Medical Assistant A medical assistant is an individual who is at least 18 years of age, meets all applicable education, training and/or certification requirements and provides administrative, clerical, and technical supportive services, according to their scope of practice, under the supervision of a licensed physician. Licensed physician co-signature recommended.	**AOD/SUD COUNSELORS** •Licensed Counselor •Certified Counselor •Registered Counselor SUD Counselors may only have credentials from DHCS approved SUD counselor certifying organizations. LPHA co-signature recommended.	**MEDI-CAL PEER SUPPORT SERVICES** •Certified Medi-Cal Peer Support Specialist (CMPSS) •Certified Medi-Cal Peer Support Specialist Family (CMPSS-F) A CMPSS is an individual with a current State-approved Medi-Cal Peer Support Specialist Certification Program certification and must meet ongoing education requirements. CMPSS provides services under the direction of a Behavioral Health Professional. Must have completed DHCS/ACBH approved peer certification. May only use codes H0025 and H0038. LPHA or Supervising CMPSS co-signatures recommended. As of publication of this guide, ACBHD has not fully implemented Medi-Cal Peer Support Services in its DMC-ODS programs. Until fully implemented, guidance is informational only.
Care Coordination	Yes	Yes	Yes [7]
Care/Discharge Planning	Yes	Yes	Yes [7]
Clinician Consultation	No	No	No
Contingency Management	No	Yes	Yes
DSM SUD Diagnosis	No	No	No
Family Therapy (90846/7)	No	No	No
Ind/Grp Counseling	No	Yes	Yes [7]
Medication Support Services	Yes	No	No
Medication Administering	Yes	No	No
Medication Dispensing	No	No	No
Prescribing (non-OTP)	No	No	No
Observation (WM) [2]	Yes	Yes	No
OTP Physical & Medical Necessity	No	No	No
OTP Med. Ordering/Prescribing	No	No	No
OTP Med. Psychotherapy	No	No	No
Patient Education	Yes	Yes	Yes [7]
Peer Support Services	No	No	Yes
Recovery Services	Yes	Yes	Yes [7]
Residential Day	Yes	Yes	No
SUD/ASAM Assessment [3]	No [6]	Yes [4]	No [6 7]
SUD Crisis Intervention Services	No	Yes	Yes [7]

- **Acronym Key**: ASAM: American Society of Addiction Medicine; OTP: Opioid Treatment Programs; MAT: Medication Assisted Treatment; WM: Withdrawal Management; SUD: Substance Use Disorder; DSM: Diagnostic and Statistical Manual of Mental Disorders; CA BBS: California Board of Behavioral Sciences.
- Note that blue text denotes a hyperlink for more information.
- For service description and provider definitions see section 12 of QA Manual.