

Memo

Date: September 23, 2024

To: Alameda County Behavioral Health Department (ACBHD) Specialty Mental Health Services (SMHS) Medi-Cal Providers

From: Torfeh Rejali, Division Director, Quality Assurance (QA) *Torfeh Rejali*
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Subject: Update to ACBHD SMHS Scope of Practice Reference Guide (Supersedes [QA Memo 2024-18](#))

On 5/3/24 ACBHD issued QA Provider Memo 2024-18, a comprehensive update to ACBHD SMHS scope of practice guidance. Since the publication of that guidance, ACBHD has received provider feedback and clarification from the California Department of Healthcare Service (DHCS), resulting in needed updates to the SMHS reference guide. This memo describes those changes. The *ACBHD SMHS Scope of Practice Reference Guide* can be found in Section 12 of the [QA Manual](#) on the ACBHD Provider website.

Limitations of Scope of Practice Guidance

ACBHD scope of practice guidance is for informational purposes only. Scope of practice standards are established by state and federal laws and regulations and corresponding credentialing and oversight entities (e.g., [CA BBS](#), [APA](#), [SAMSHA](#), etc.). Practitioners are responsible for following all applicable and relevant laws, regulations, standards, and ethical practices when providing services, regardless of ACBHD's guidance.

Overview of updates to SMHS Scope of Practice Reference Guide

The following is an overview of some of the changes/updates to the *SMHS Scope of Practice Reference Guide*:

1. Clarification of supervision requirements for Registered Nurses (RNs), Licensed Vocational Nurses (LVNs), and Psychiatric Technicians (PTs) as described by the board of nursing and Chief Nursing office.
 - [RNs](#) can direct treatment, however, cannot prescribe medications. Medical services provided by RNs must be under supervision per their credentials.
 - [LVNs](#) and [PTs](#), must be under the direct supervision of a licensed practitioner, such as NPs and Physicians.
2. Addition of new provider types that are allowed to have clinical trainees:
 - Clinical trainees were allowed for all Licensed Mental Health Professionals (LMHPs), and are now also allowed for Pharmacists and Physician Assistants, see



[Behavioral Health Information Notice \(BHIN\) 24-023](#), and [1603-3-3 ACBHD Clinical Trainee](#) policy.

3. Clarification of Medicare billing requirements for Licensed Marriage and Family Therapist (LMFTs) and Licensed Professional Clinical Counselors (LPCCs).

Support

Providers are invited to join monthly QA Brown Bag meetings where this and other relevant information are discussed. Meeting details and link can be found on the [QA Training page](#).

For questions, please contact QATA@acgov.org.