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Interim Behavioral Health Director

POLICY TITLE

Verification of Professional Credentials for Substance Use Disorder Treatment Services

Policy No: 1650-1-2

Date of Original Approval: 6/30/14

Date(s) of Revision(s): 4/7/15; 6/5/17

PURPOSE

This policy addresses the need to ensure Alameda County Behavioral Health Care Services (BHCS) confirm, at least annually, that all contracted providers and personnel of substance use disorder (SUD) treatment are properly credentialed and in compliance with federal, state and county regulations.

AUTHORITY

Current BHCS contracts with the California Department of Health Care Services (DHCS); Health and Safety Code (HSC) 11833(e); DHCS MHSUDS Info Notice No.: 16-058; 22 CCR Section 51341.1 (Definitions of Counselor and Therapist); Title 9 Div 4 Chap 8 (Certification of Alcohol and Other Drug Counselors);

SCOPE

All providers, contracted or subcontracted with BHCS, whose treatment staff or volunteers provide clinical SUD services in a certified and/or licensed program.

POLICY

This policy establishes contractual requirements and procedures for contracted and subcontracted SUD treatment providers to comply with staff registration, staff credentialing, staff qualifications and BHCS annual credential verification procedures for SUD treatment staff.

PROCEDURE

- I. Contracted Providers will:
 - a. Submit to the BHCS Network Office, annually, as required or requested, a list of registered, certified and/or licensed staff using the DHCS electronic form 5050 A-5 Facility Staffing Data <http://www.dhcs.ca.gov/provgovpart/Documents/DCSS5050.pdf> (attachment A).
 - i. Any individual who provides counseling services in a licensed or certified alcohol and other drug (AOD) program, with the exception of LPHAs, must be registered or certified with a DHCS approved certifying organization prior to the provision of services.
 - b. Maintain direct service staff records that include a copy of primary source verification of professional credentials. Falsification or misrepresentation of credentials shall be grounds for immediate investigation. Verification may include but is not limited to a copy of:
 - i. A license issued by the State of California
 - ii. A certificate from a DHCS-approved organization

- iii. Internet verification using a State-approved organization
- iv. Reports from credentialing or licensing organization
- c. Adhere to the policy "[OIG and Other Exclusion List Monitoring, Oversight and Reporting](#)" which includes, but is not limited to, the following:
 - i. Provider shall inform BHCS of staff additions, departures, and staff information changes as needed using the BHCS *Staff Number (SUD) Request E-Form* located on the Provider e-Forms page: <http://achcsa.org/behavioral-health/eforms.aspx>. Attest monthly, no later than the 15th of each month, that provider has made all necessary staff changes listed above. Use the BHCS Monthly Staff Change Attestation form located on the Provider e-Forms page: <http://achcsa.org/behavioral-health/eforms.aspx>
 - ii. Provider shall check all required exclusion lists prior to hiring any staff per the above-mentioned policy.

II. BHCS Monitoring of Verification of Professional Credentials

- a. BHCS Network Office will:
 - i. Conduct annual contract monitoring site visits that includes review of the provider employee files and source documents that verify credentials
 - ii. Ensure that at least 30% of staff providing counseling services are licensed or certified (a registered intern is classified as a therapist-see definition below)
 - iii. Ensure contracted provider's annual submission of a staff list includes the aforementioned information
- b. Provider Relations Office will:
 - i. Coordinate the production of an InSyst monthly clinic report of the licensing and credentialing expiration dates for follow up to the Clinic agencies, BHCS SUD QA unit and the Network Office
- c. BHCS Quality Assurance Office will:
 - i. Review and verify SUD contracted provider staff listing, validate the listed professional credentials and check for 30% ratio of certified or licensed staff
 - ii. Maintain a record of verification reviews and when compliance is in question produce a report of findings within thirty (30) days of the review
 - iii. Follow-up with the Network Office, Provider Relations and the Alcohol and Drug Administrator when questions of compliance or other staff related issues are identified

III. Retention of records

- a. Credentialing and verification records shall be maintained for a minimum of three (3) years by contracted providers and BHCS.

CONTACT

BHCS Office	Current as of	Email
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DISTRIBUTION

This policy will be distributed to the following:

- ACBHCS Staff
- ACBHCS County and Contract Providers
- Public

ISSUANCE AND REVISION HISTORY

Original Authors: Dave Abramson, MA; Sharon Loveseth LAADC
Original Date of Approval: 06/30/2014
Date of Revision: 6/5/17

Revise Author	Reason for Revise	Date of Approval by
Sharon Loveseth, LAADC	MHSUDS Information Notice No: 16-058	Don Kingdon, PhD; Interim Director

DEFINITIONS

Term	Definition
Alcohol and Other Drug Program	Means any of the following licensed or certified by DHCS: Driving Under the Influence (DUI); Narcotic Treatment Program (NTP); Residential SUD Recovery or Treatment Program; Drug Medi-Cal; Outpatient or Intensive Outpatient Treatment; An alcohol or drug recovery or treatment program
Substance Use Disorder (SUD) Counselor	The requirements for certification for individuals providing counseling services in alcohol and other drug recovery and treatment programs are found in the California Code of Regulations (CCR), Title 9, Division 4, Chapter 8; and Mental Health & Substance Use Disorder Services Information Notice 16-058 (see attachment C)
Licensed Professional of the Healing Arts (LPHA)	Means any of the following: Physician; Nurse Practitioner (NPs); Physician Assistants (PAs); Registered Nurses (RNs); Registered Pharmacists (RPs); Licensed Clinical Psychologists (LCPs); Licensed Clinical Social Workers (LCSWs); Licensed Professional Clinical Counselors (LPCCs); Licensed Marriage and Family Therapists (LMFTs); and License-Eligible Practitioners working under the supervision of licensed clinicians.
Therapist	Means any of the following: A. a psychologist licensed by the California Board of Psychology; B. a clinical social worker or marriage and family therapist licensed by the California Board of Behavioral Sciences; C. an intern registered with the California Board of Psychology or the California Board of Behavioral Sciences; or D. a physician.
Registrant Counselor	Registrants are required to complete certification as a substance use disorder counselor within 5 years from the date of initial registration with any DHCS approved certifying organization (CCR, Section 13035(f)(1)). Registrants providing counseling services in a substance use disorder program must be registered to obtain certification as an alcohol and other drug counselor by one of the DHCS approved certifying organizations (Health and Safety Code, Section 11833(b)(1)).
Intern Therapist	All non-licensed individuals providing counseling services in a substance use disorder program must be registered with the licensing board of a state approved clinical organization.
DHCS Approved Certifying Organization	DHCS has approved the following three (3) SUD counselor certifying organizations: Addiction Counselor Certification Board of California (CAADE); California Association of Driving Under the Influence (DUI) Treatment Programs (CADTP); California Consortium of Addiction Programs and Professionals (CCAPP).

ATTACHMENTS

- A. SUD Treatment Program Counseling Staff Certification Status "DHCS 550 Report form"
- B. MHSUDS Information Notice "No.: 16-058"

