

- MEMORANDUM -

DATE: November 15, 2022

TO: Alameda County Behavioral Health (ACBH) Substance Use Treatment Providers

FROM: Torfeh Rejali, Quality Assurance Administrator *Torfeh Rejali*
Brion Phipps, Clinical Review Specialist Supervisor *Brion Phipps*

SUBJECT: **Update to Substance Use Disorder (SUD) Treatment Plan Requirements – SABG**

This memo announces a change to treatment plan requirements for all SUD services that are funded by [SAMHSA Substance Abuse Block Grant \(SABG\)](#).

Background

On April 22, 2022 the California Department of Health Care Services (DHCS) issued [BHIN 22-019](#) updating documentation requirements for Specialty Mental Health and Drug Medi-Cal services. This BHIN indicated that treatment plans would no longer be required for most SUD services. CalAIM, however is a California state initiative and does not change applicable federal regulations or guidance. One such federal requirement that has not yet changed, are requirements related to SABG.

Treatment Plan Requirements

Per the SABG requirements, effective immediately, all substance use treatment providers must document a treatment plan for services that are SABG funded.

SABG treatment plan requirements are described starting on page 4 of [Document 2F\(b\) Minimum Quality Drug Treatment Standards for SABG](#) and apply to all services either fully or partially funded by the SABG. Per Document 2F(b):

- Treatment plans shall be developed with the client within 30 days of admission and include:
 - A problem statement for all problems identified through the assessment whether addressed or deferred.
 - Goals to address each problem statement (except when deferred).
 - Action steps to meet the goals that include who is responsible for the action and the target date for completion.
 - Signature of primary counselor and client.
 - All treatment plans shall be reviewed periodically and updated to accurately reflect the client’s progress or lack of progress in treatment.
- Progress notes shall document the client’s progress toward completion of activities and achievement of goals on the treatment plan.





If your program receives federal SABG funds, the treatment plan requirements specified in this memo are required for beneficiaries who receive services at your program. This is true for all services that are SABG funded. Note that only those beneficiaries whose services are funded by SABG require treatment plans.

ACBH, along with counties across the state, are advocating and lobbying DHCS to address these overlapping requirements. However, at this time all SABG requirements remain in place. As soon as we have an update related to this issue, we will communicate this to our system.

Next Steps

Please communicate and implement this change immediately, as appropriate.

Changes resulting from this memorandum will be discussed during monthly SUD Brown Bag meetings. SUD Brown Bags are scheduled every third Thursday of the month from 12 to 1 PM. If you do not have the meeting already on your calendar, below is the link and call-in information:

Link: <https://global.gotomeeting.com/join/486928181>

If you have any questions and/or comments, please contact QATA@acgov.org.

