

- MEMORANDUM -

DATE: October 4, 2022  
TO: Alameda County Behavioral Health (ACBH) Drug Medi-Cal Organized Delivery System (DMC-ODS) Residential Providers  
FROM: Torfeh Rejali, Quality Assurance (QA) Administrator *Torfeh Rejali*  
SUBJECT: Change in Treatment Plan Requirements for DMC-ODS Residential Providers

This memorandum announces the removal of the 10 day treatment plan requirement for residential substance use disorder (SUD) facilities. SUD residential programs are still required to complete treatment plans within 30 days of the client's admission to their program.

### Background

Substance use services are covered by a number of different regulations, including the following:

- Department of Health Care Services (DHCS) – DMC-ODS Intergovernmental Agreement / CalAIM
- DHCS Alcohol and/or Other Drug (AOD) Program Certification Standards
- Substance Abuse Prevention and Treatment Block Grant ([SABG](#))

With the roll out of CalAIM in July 2022, DHCS attempted to remove the requirement for treatment plans as much as possible. Although this was accomplished for outpatient levels of care, it could not be accomplished for residential programs due to AOD Program Certification Standards and SABG rules.

### What is Changing

DHCS is in the process of updating the AOD Program Certification Standards to remove the treatment plan requirements for residential providers. In their recently published [CalAIM FAQ](#) document, they state that “until the AOD Program Certification Standards have been updated, Medi-Cal providers may use a Problem List, as defined in [BHIN 22-019](#), in lieu of a treatment plan for beneficiaries.”

Given this directive from DHCS, effective immediately, SUD residential programs are no longer required to complete treatment plans within 10 days of admission. SABG requirements for completed treatment plans within 30 days of admission, still apply and should be followed.

Additionally, treatment plans no longer need to be updated during established timeframes. Rather, per SABG, “All treatment plans shall be reviewed periodically and updated to accurately reflect the client's progress or lack of progress in treatment.”

Per [SABG](#) requirements, treatment plans must include:

- i. A problem statement for all problems identified through the assessment whether addressed or deferred;
- ii. Goals to address each problem statement (except when deferred);
- iii. Action steps to meet the goals that include who is responsible for the action and the target date for completion;



iv. Signature of primary counselor and client.

#### **Action Required**

Please communicate this change to your teams.

#### **Support**

Changes resulting from the CalAIM initiatives will continue to be discussed during monthly Brown Bag meetings. We welcome questions and opportunities for clarification of these significant changes. **Brown Bags are scheduled every third Thursday of the month from 12pm-1pm. The next Brown Bag meeting is scheduled for October 20, 2022.** If you do not have the meeting already on your calendar, please send a note to [QATA@acgov.org](mailto:QATA@acgov.org) to request the invitation.

For questions, please contact [QATA@acgov.org](mailto:QATA@acgov.org).

