

- MEMORANDUM -

DATE: August 2, 2023
TO: All Alameda County Behavioral Health Care Services Providers
FROM: Torfeh Rejali, LMFT, Quality Assurance Division Director *Torfeh Rejali*
Brion Phipps, Quality Assurance Associate Administrator *Brion Phipps*
SUBJECT: Updated SmartCare Procedure Code Tables and CPT Code Guidance for Mental Health (MH) Students

This memo is to announce updates to the ACBH SmartCare Procedure Code Tables for Mental Health (MH) and Substance Use Disorder (SUD) services, and ACBH-selected CPT codes that can be used temporarily by pre-licensed, non-registered mental health graduate students who provide Specialty Mental Health Services (SMHS).

As many are aware, the Department of Health Care Services (DHCS) had more recently issued guidance restricting mental health student (i.e. pre-licensed, non-registered) SMHS scope of practice (e.g. therapy services). We are pleased to announce that ACBH is now in a position to not only allow students to continue rendering services they have prior to CalAIM Payment Reform, but to also provide guidance on CPT code selections. ACBH has the priority focus on our workforce and continuance of critical service delivery. Due to statewide advocacy efforts, including those by Alameda County stakeholders, DHCS has submitted a State Plan Amendment (SPA) to Centers for Medicare and Medicaid (CMS) for students to be a recognized provider type.

Background

With the roll out of CalAIM Payment Reform, provider billing transitioned from the use of primarily Level II Healthcare Common Procedure Coding System (HCPC) codes to a combination of Level I (CPT) and Level II codes. To assist providers with this transition, ACBH published two SmartCare Procedure Code Tables (MH and SUD) listing all codes available in SmartCare with detailed information about each code and a crosswalk to previously used InSyst Codes.

Information About ACBH Student Codes

Per DHCS SMHS Billing Manual ([v 1.4](#)), MH students are restricted from using CPT codes, limiting them to using taxonomy codes based on their education, training, and experience within the Mental Health Rehabilitation Specialist ([MHRS](#)), Other Qualified Provider, and Peer Specialist disciplines. Per ACBH memo [2023-46](#), ACBH recognized the impact of this restriction on its providers and beneficiaries and announced its plan to continue to reimburse contractors for individual, family, and group psychotherapy services provided by students through the first quarter of FY23-24 (July 1, 2023 – September 30, 2023).

DHCS was notified of the potential adverse impact of this restriction and is expected to release new guidance along with information detailing what procedure codes students can use for billing purposes dating back to July 1, 2023. ACBH will notify providers when that guidance is received.



Now included in the MH SmartCare Procedure Code Table, are a number of student specific psychotherapy codes. These codes are prefixed with STDNT and have a green background. The ACBH student codes are designed to supplement existing codes available to pre-licensed, non-registered staff and the currently DHCS allowable codes should be used as much as possible. The ACBH student codes may only be used by individuals actively enrolled in a qualified mental health graduate program and must be supervised as required by their corresponding credentialing board and according to university requirements.

Updated SmartCare Procedure Code Tables

The MH and SUD SmartCare procedure code tables were recently updated to clarify details related to certain codes, add new CPT codes that were absent from the list but used by some provider groups, and highlight ACBH-selected CPT codes that can be used by students while awaiting DHCS guidance. Please note that the ACBH-created codes for students may not align with DHCS's yet to be established process and are being offered as a temporary remedy until DHCS provides additional guidance. The ACBH SmartCare procedure code tables can be found on the [QA provider site training page](#).

Please see the KEY tab in the document to identify the changes.

Action Required

Please share this information with your staff, as appropriate.

For questions, please contact QATA@acgov.org.

