

Memo

Date: November 1, 2024

To: Alameda County Behavioral Health Department (ACBHD) Drug Medi-Cal Organized Delivery System (DMC-ODS) Providers

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Subject: ACBHD Substance Use Disorder (SUD) Scope of Practice Reference Guide

This memo is to inform ACBHD DMC-ODS providers of updates to ACBHD's SUD scope of practice guidance.

Background

While the CalAIM initiative does not make changes to California's scope of practice laws and regulations (e.g., [CA Business and Professions Code, Division 2 Healing Arts](#)), updates are required due to recent clarifications and stricter Medi-Cal enforcement of taxonomies on individual procedure codes. Additionally, Department of Health Care Services (DHCS) has expanded and clarified provider types for each delivery system as described in [Behavioral Health Information Notice \(BHIN\) 24-023](#), which was issued on 6/17/2024. This BHIN clarifies what types of DMC-ODS providers are considered Licensed Practitioners of the Healing Arts (LPHAs), the role of student clinical trainees, and defines several additional non-LPHAs DMC-ODS provider disciplines.

As a result of these changes, ACBHD is aligning its SUD guidance to be consistent with current laws and regulations related to scope of practice.

New ACBHD SUD Scope of Practice Reference Guide

ACBHD has developed a new reference guide, titled *ACBHD SUD Scope of Practice Reference Guide* detailing the specific scope of practice for all DMC-ODS provider disciplines. This resource can be found in section 12 of the [QA Manual](#) on the ACBHD Provider website and replaces an older version titled *ACBHD SUD Scope of Practice Guide*.

Also note that section 12 of the QA Manual was renamed *Service Descriptions and Scope of Practice*, and all existing documents related to these topics were moved to this section for ease of reference.

Limitations of ACBHD SUD Scope of Practice Reference Guide

The guidance provided in the *ACBHD SUD Scope of Practice Reference Guide* 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., [CABBS](#), [APA](#), [SAMSHA](#), etc.). Practitioners are individually responsible for following all applicable and relevant laws, regulations, standards, and ethical practices when providing services to members regardless of ACBHD's guidance.

Overview of Changes to DMC-ODS Scope of Practice

The following is an overview of some of the changes from previous ACBHD SUD scope of practice guidance:

1. Clarification of provider definitions and qualifications, including the definition of Licensed Practitioners of Healing Arts (LPHA) within the Drug Medi-Cal Organized Delivery System (DMC-ODS). See document titled “[MH and SUD Provider Definitions and Qualifications](#)” in section 12 of the QA Manual for detailed information about different provider types recognized by DHCS.
2. Addition of Occupational Therapists (OTs), Medical Assistants (MAs), Licensed Vocational Nurses (LVNs), and Licensed Psychiatric Technicians (PTs) to align with current DMC-ODS allowable disciplines.
3. Clarification that according to California Board of Registered Nursing, Registered Nurses (RNs) cannot diagnose mental health or substance use disorders but can complete an ASAM assessment if they have completed the two required ASAM training modules.
4. Clarification that in order to provide detoxification services (e.g., 3.2-WM) individuals must have completed appropriate training in detoxification treatment.
5. Clarification that Physician Assistants (PAs) and Nurse Practitioners (NPs) can complete physical exams and medical necessity at Opioid Treatment Programs (OTPs) but require physician review and concurrence.
6. Clarification of Medicare billing requirements for Licensed Marriage and Family Therapist (LMFTs) and Licensed Professional Clinical Counselors (LPCCs).
7. Addition of clinical trainees and their scope of practice to the reference guide.¹
8. Addition of Certified Medi-Cal Peer Support Specialist (CMPSS) provider type and their scope of practice to the reference guide.²
9. Removal of Registered Psychologist provider type pursuant to [CA Senate Bill 801 \(2021\)](#).
10. Addition of MFT-Candidate, PCC-Candidate, and MSW-Candidate provider types, per CA BBS and Medi-Cal, “[90-Day Rule](#).”

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.

¹ At the time of publication of this memo ACBHD has not fully implemented Clinical Trainees in its SUD network. Until full implementation, guidance is informational only.

² Similar to Clinical Trainees, ACBHD is in the process of adding peer services to its SUD network. Until full implementation, guidance is informational only.