alameda county behavioral health

MENTAL HEALTH & SUBSTANCE USE SERVICES

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- MEMORANDUM -

DATE: February 28, 2024

TO: All Alameda County Behavioral Health (ACBH) Substance Use Disorder (SUD) Treatment Programs

FROM: Torfeh Rejali, LMFT, Division Director, Quality Assurance   *Torfeh Rejali*

     Brion Phipps, LCSW, Interim Quality Assurance Associate Administrator   *Brion Phipps*

SUBJECT: **Updated SUD Assessment and Related Requirements**

This memo provides information related to changes to SUD/Drug Medi-Cal Organized Delivery System (DMC-ODS) assessments effective January 1, 2024.

Regulatory Guidance

As part of the CalAIM Behavioral Health initiative the California Department of Health Care Services (DHCS) has recently updated DMC-ODS documentation standards.[1] Opioid/Narcotic Treatment Programs (OTP/NTPs) are exempt from CalAIM documentation reform changes. Details related to OTP/NTPs can be found on page 2 of this memo.

Changes to SUD Assessment Timeframes

Behavioral Health Information Notice (BHIN) 23-068, which supersedes BHIN 22-019, aligns assessment timeframes with Specialty Mental Health Services (SMHS). Per DHCS, "providers shall use their clinical expertise to complete initial assessments and subsequent assessments as expeditiously as possible in accordance with each member's clinical needs and generally accepted standards of practice." Assessments shall be updated as clinically appropriate, such as when the member's condition changes.

The new document titled *Assessment Requirements for ACBH DMC-ODS Providers* posted in Section 7 of the QA Manual on the ACBH provider website provides additional information regarding the requirements at each level of care (LOC).

ASAM Requirements and Brief Screening Tools

For all non-OTP LOCs, both licensed and non-licensed providers, including those not qualified to diagnose, may contribute to the assessment consistent with their scope of practice. If the assessment is completed by a registered or certified counselor, then a Licensed Practitioner of the Healing Arts (LPHA) shall review the assessment with the counselor and the LPHA must make the initial diagnosis.[2]

Medi-Cal requires that beneficiaries getting DMC-ODS services receive an assessment that is based on The ASAM Criteria text. ACBH has developed several custom ASAM assessment templates in the county

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[1] See DHCS Behavioral Health Information Notices (BHINs) 21-001, 23-054, 23-068, and 24-001 for reference. Please note that the intended audience for BHINs and other guidance from DHCS is county administrative entities. County implementation of DHCS guidance may not be exactly as written due to county specific factors.

[2] SUD Counselors and first year clinical trainees do not have the scope of license to diagnose and may not establish a substance use disorder (i.e., complete the SUD Diagnosis form in Clinician's Gateway), even with a co-signature.

managed electronic health record, Clinician's Gateway (CG). Per BHIN 23-068, effective January 1, 2025, DMC-ODS providers shall use one of the DHCS authorized ASAM tools.[3] To meet these new requirements, ACBH will be updating the ASAM assessment templates in CG. Additional information about this transition will be forthcoming from ACBH.

In some situations, a brief screener or brief ASAM assessment can be a useful tool. Aside from Early Intervention Services (EIS), brief screeners do not take the place of the full ASAM assessment requirements. Brief screeners can be helpful at the start of SUD services to identify the correct LOC. At this time, the ACBH ASAM Level of Care (ALOC) may be used as a brief ASAM.

The Brief Questionnaire for Initial Placement (BQuIP)

In partnership with DHCS, The University of California, Los Angeles (UCLA) has developed a free web-based level of care tool (LOC) for adults called the BQuIP. This brief tool is available for use by ACBH subcontracted providers to determine the initial LOC. Use of the BQuIP is strictly optional and does not replace any ACBH or DHCS ASAM assessment requirements.

An example of a use case scenario for the BQuIP is by a non-OTP outpatient provider, who uses BQuIP to screen a walk-in client to determine the initial LOC placement prior to opening in SmartCare.

Use of the BQuIP is to adhere to training and other requirements as specified at https://www.uclaisap.org/bquiptool/. Do not enter any beneficiary protected health information (PHI) into the tool. Once complete, download the PDF and store it in the beneficiary's medical record. At outpatient programs, staff time spent completing the BQuIP tool can be reported with an ASAM assessment code.

Opioid/Narcotic Treatment Programs

OTP/NTPs are administered in Alameda County by ACBH under the authority of the DMC-ODS Intergovernmental Agreement and Behavioral Health Information Notice (BHIN) 24-001 (and any that supersede it). Per DMC-ODS all beneficiaries receiving SUD treatment must receive an assessment based on the ASAM criteria. OTP/NTPs are required to complete the ASAM Level of Care (ALOC) in CG, prior to completion of the initial plan. Please ensure that beneficiaries receive holistic ASAM-based assessments and documentation includes all SUD LOCs the beneficiary meets criteria for, as well as non-SUD treatment needs and referrals.

Documentation standards for OTP/NTPs are detailed in 9 CCR § Division 4, Chapter 4 Narcotic Treatment Programs. OTP/NTP assessment requirements are detailed in 9 CCR § 10305 (d).

Peer Support Services Assessment Requirements

ACBH is in the process of implementing Peer Support Services. Upon implementation, peer support services will be available across the ACBH SUD system.

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[3] https://www.asam.org/asam-criteria/implementation-tools/criteria-intake-assessment-form

Due to scope of practice limitations, Certified Peer Specialists cannot conduct assessment activities. When Peer Support Services are provided along with other SUD treatment services (e.g., at a residential program), then required assessment activities will be completed as part of the LOC admission. When Peer Support Services are provided as a standalone service (only available at non-OTP outpatient programs), assessment requirements must be completed by clinical staff with the scope of practice to do so (e.g., LPHA or SUD Counselor) and medical necessity/access criteria for DMC-ODS services needs to be established by a LPHA.

Additional information regarding Peer Support Services documentation requirements is forthcoming.

Action Required

Please share this information with your teams to ensure SUD assessment activities are compliant with DMC-ODS requirements.

Support

We invite you to join us for monthly SUD "Brown Bag" meetings to discuss this and other QA-related topics. Information about the SUD Brown Bag and a meeting link can be found on the QA Training page. Meeting notes are transcribed and posted in the same section of the QA Training page.

For questions, please contact QATA@acgov.org.