



QUALITY ASSURANCE BULLETIN

Sutter-Yuba Behavioral Health Quality Assurance Office

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Standards for Specific Behavioral Health Provider Types and Services

The California Department of Healthcare Services (DHCS) has made changes to the types of providers that can provide Specialty Mental Health Services (SMHS), Drug Medi-Cal (DMC), and Drug Medi-Cal-Organized Delivery System (DMC- ODS) services to achieve greater consistency and allow more providers to provide behavioral health care across these delivery systems.

This memo provides updates to Title 9 and Title 22 CCR regulations for Medi-Cal behavioral health delivery systems to implement State Plan Amendment (SPA) 23-0026 which allows Licensed Professional Clinical Counselors (LPCCs), Licensed Vocational Nurses (LVNs), Licensed Psychiatric Technicians (LPTs), Licensed Occupational Therapists (LOTs), Medical Assistants (MAs), and Clinical Trainees (CTs) to provide specified Medi-Cal behavioral health services and removes existing limitations on field-based services and individual counseling services in the Drug Medi-Cal delivery system.

County Mental Health Plans (MHPs), DMC counties, and DMC- ODS counties (collectively referred to as “Medi-Cal behavioral health delivery systems”) may now utilize additional providers for specialty mental health and SUD treatment services:

Provider Type	Current Delivery System	Added Delivery System (Effective 7/1/23)
Licensed Vocational Nurses (LVNs) ¹	SMHS	DMC DMC-ODS
Licensed Psychiatric Technicians (LPTs) ²	SMHS	DMC DMC-ODS
Licensed Occupational Therapists (LOTs) ^{3,4}	SMHS	DMC DMC-ODS
Medical Assistants (MAs) ⁵	-	SMHS DMC DMC-ODS
Clinical Trainees (CTs) ⁶	-	SMHS DMC DMC-ODS
Licensed Professional Clinical Counselors (LPCCs) ⁷	SMHS DMC-ODS	DMC

¹ Adds LVNs as Licensed Practitioners of the Healing Arts (LPHAs) that may provide specified DMC and DMC-ODS services.

² Adds Licensed Psychiatric Technicians as LPHAs that may provide specified DMC and DMC-ODS services.

³ Adds LOTs as LPHAs that may provide specified DMC and DMC-ODS services.

⁴ Permits LOTs to direct services in the SMHS delivery system.

⁵ Defines and adds MA as providers of specified SMHS, DMC, and DMC-ODS services.

⁶ Defines and adds CT as providers of specified SMHS, DMC, and DMC-ODS services.

⁷ [SPA 20-0006-A](#): Adds LPCCs as providers of specified DMC services. Removes limitations under Title 22 to permit LPCCs to provide DMC services.

In addition to the provider changes listed above, the following updates apply:

- The definition of “registered” now includes individuals who are in the process of obtaining registration as social worker candidates, marriage and family therapist candidates, and professional clinical counselor candidates (as well as individuals whose registrations as candidates for these licensure types have been approved by the California Board of Behavioral Sciences [BBS]).
- The definitions of Other Qualified Provider, Licensed Mental Health Professional (LMHP), and “under the direction of” are amended for TCM Services to be consistent with the same terms used for other Specialty Mental Health Services in the Rehabilitative Mental Health Treatment Services pages of the State Plan.

Clinical Trainee and Medical Assistant Definitions

The state plan defines Clinical Trainees and Medical Assistants as follows:

- Clinical Trainee – SUD/SMHS-A CT – SUD/SMHS is an unlicensed individual who is enrolled in a post-secondary educational program that is required for the individual to obtain licensure as a LPHA (for CT SUD) or a Licensed Mental Health Professional (for CT SMHS); is participating in a practicum, clerkship, or internship approved by the individual's program; and meets all relevant requirements of the program and/or the applicable licensing board to participate in the practicum, clerkship, or internship and provide specialty mental health or substance use disorder treatment services, including, but not limited to, all coursework and supervised practice requirements.
- Medical Assistant (MA) – SUD/SMHS-A Medical Assistant - SUD/SMHS is an individual who is at least 18 years of age, meets all applicable education, training and/or certification requirements, and provides administrative, clerical, and technical supportive services according to their scope of practice, under the supervision of a licensed physician and surgeon, or to the extent authorized under state law, a nurse practitioner or physician assistant that has been delegated supervisory authority by a physician and surgeon. The licensed physician and surgeon, nurse practitioner or physician assistant must be physically present in the treatment facility (medical office or clinic setting) during the provision of services by a medical assistant.

Clinical Social Worker (CSW), Marriage and Family Therapist (MFT), and Professional Clinical Counselor (PCC) Candidates:

- CSW, MFT, and PCC candidates who have graduated from a master’s program and are completing their required hours for licensure must register with the BBS as an associate. The “90 Day Rule” set by the BBS allows candidates to count supervised experience toward licensure when gained during the window of time between the degree award date and the issue date of the associate registration number if BBS receives the associate application within 90 days of the degree award date.
- CSW, MFT, and PCC candidates who have submitted their applications for associate registration to BBS within 90 days of their degree award date and are completing supervised experience toward licensure to provide SMHS, DMC-ODS and DMC services to Medi-Cal members. CSW, MFT, and PCC candidates must act within their scopes of practice under California law. Documentation to verify that the candidate’s BBS application has been submitted and is pending is required and must subsequently verify that the registration is approved. Services rendered by CSW, MFT, and PCC candidates completing supervised experience can be reimbursed while their BBS application is pending. In the event the BBS application is not approved by BBS, the services provided by the candidate are not Medi-Cal reimbursable.

Updates to Drug Medi-Cal

- 22 CCR section 51341.1 (b)(10) defines “face-to-face”, restricts service delivery to certified facilities only, and includes limitations for telephone contact, home visits, and hospital visits. 22 CCR section 51341.1 (b)(10) has been amended to allow for the provision of field-based services.
- Historically LPCCs have not been permitted to provide DMC services. LPCCs are now allowed to provide DMC services, including individual and group counseling, as appropriate within their scope of practice.
- Finally, 22 CCR section 51341.1 (d)(2)(B) has been amended to allow individual counseling as recommended by a LPHA operating within their scope of practice based on medical necessity.

For dates of service on or after July 1, 2023, Medi-Cal behavioral health delivery systems may submit claims to for services rendered by the new CT provider types listed below:

- Nurse Practitioner Clinical Trainee
- Licensed Psychologist Clinical Trainee
- Licensed Clinical Social Worker Clinical Trainee
- Licensed Marriage and Family Therapist Clinical Trainee
- Licensed Professional Clinical Counselor Clinical Trainee
- Licensed Psychiatric Technician Clinical Trainee
- Registered Nurse Clinical Trainee
- Licensed Vocational Nurse Clinical Trainee
- Licensed Occupational Therapist Clinical Trainee
- Licensed Physician Clinical Trainee (Medical Student)
- Registered Pharmacist Clinical Trainee
- Physician Assistant Clinical Trainee
- (Certified) Clinical Nurse Specialist Clinical Trainee (Specialty Mental Health Delivery System only)

SMHS Provider Qualifications

Within the SMHS delivery system, rehabilitative mental health treatment services include assessment, medication, support services, peer support services, psychosocial rehabilitation, therapy, and treatment planning. MAs and CTs are added as providers for a subset of these services, within their respective scopes of practice as outlined below:

Rehabilitative Mental Health Treatment Services							
	Assessment	Medication Support Services	Peer Support Services	Psychosocial Rehabilitation	Referral & Linkages	Therapy	Treatment Planning
Provider Qualifications	L, M, PA, Ph, OP, MA, CT	CT, L, MA, PA, Ph	P	L, M, PA, Ph, OP, MA, CT	L, M, PA, Ph, OP, MA, CT	L, CT	L, M, PA, Ph, OP, MA, CT

DMC and DMC-ODS Provider Qualifications

Within the DMC program, SUD treatment services include assessment, counseling (individual and group), medical psychotherapy, medication services, patient education, peer support services, and SUD crisis intervention. MAs and CTs are added as providers able to bill for a subset of these services within their respective scopes of practice as outlined below:

SUD Treatment Services												
	Assessment*	Counseling (Individual & Group)	Medical Psychotherapy	Medication Services	Patient Education	Peer Support Services	SUD Crisis Intervention					
Provider Qualifications	C, CT, L*, MA	C, CT, L	M	CT, L, MA	C, CT, L, MA	P	C, CT, L					
Expanded SUD Treatment Services												
	Asses*	Care Coord*	Crisis Inter.	Family Ther.	Counsel (Ind.& Group)	Medical Psychotherapy	Med Service	Patient Ed	Peer Support Service	Obser.	Recovery Services	Prescribing and Monitoring of MAT for AUD and Other Non- Opioid SUD
Provider Qualification	C, CT, L*, MA	C, CT, L, MA	C, CT, L	CT, L	C, CT, L	M	CT, L, MA	C, CT, L, MA	P	C, CT, L, MA	C, CT, L, MA	CT, L***, MA

Abbreviations

CT = Clinical Trainee, L = Licensed Mental Health Professional, M = Mental Health Rehabilitation Specialist, MA = Medical Assistant, P = Peer Support Specialist, PA = Physician Assistant, Ph = Pharmacist, OP = Other Qualified Provider

MAT for Opioid Use Disorder (OUD)

MAT for OUD Services includes assessment, crisis intervention, counseling (individual and group), medical psychotherapy, medication services, patient education, and prescribing and monitoring of MAT. MAs and CTs are added as providers able to bill for a subset of these services within their respective scopes of practice as outlined below:

MAT for OUD Services							
	Assess*	Crisis Inter	Counseling (Ind. & Group)	Medical Psychotherapy	Medication Services	Patient Education	Prescribing & Monitoring of MAT for OUD
Provider Qualifications	C, CT, L*, MA	C, CT, L	C, CT, L	M	CT, L, MA	C, CT, L, MA	CT, L***, MA

Abbreviations

CT = Clinical Trainee, L = Licensed Mental Health Professional, M = Mental Health Rehabilitation Specialist, MA = Medical Assistant, P = Peer Support Specialist, PA = Physician Assistant, Ph = Pharmacist, OP = Other Qualified Provider

*The physical examination shall be conducted by an LPHA in accordance their scope of practice and licensure. An SUD/OUD diagnosis may only be made by an LPHA.

**Registered or certified counselors may assist with some aspects of this service, however, a licensed provider is responsible for supervising this service component. All personnel performing observations must complete training in withdrawal management.

***May be provided by an LPHA within their scope of practice. Providers must be a waived prescriber of buprenorphine to prescribe or order buprenorphine.

Qualified Mobile Crisis Team Members by Delivery System

Rehabilitative Mental Health Treatment Providers*	SUD Treatment Providers**	Expanded SUD Treatment Providers**	Other Provider Types***
<ul style="list-style-type: none"> • Physician • Psychologist • Waivered Psychologist • Licensed Clinical Social Worker • Waivered/Registered Clinical Social Worker • Licensed Professional Clinical Counselor • Waivered/Registered Professional Clinical Counselor • Marriage and Family Therapist • Waivered/Registered Marriage and Family Therapist • Registered Nurse • Certified Nurse Specialist • Licensed Vocational Nurse • Psychiatric Technician • Mental Health Rehabilitation Specialist • Physician Assistant • Nurse Practitioner • Pharmacist • Occupational Therapist • Other Qualified Provider • Peer Support Specialist • Clinical Trainee • Medical Assistant 	<ul style="list-style-type: none"> • Peer Support Specialist • Clinical Trainee • Medical Assistant 	<ul style="list-style-type: none"> • LPHA • AOD Counselor • Peer Support Specialist • Clinical Trainee • Medical Assistant 	<ul style="list-style-type: none"> • Community Health Workers as defined in the Community Health Worker Services preventive services benefit. • Emergency Medical Technicians. Emergency Medical Technicians must be certified in accordance with applicable State of California certification requirements. • Advanced Emergency Medical Technicians. Advanced Emergency Medical Technicians must be certified in accordance with applicable State of California certification requirements. Paramedics. Paramedics must be licensed in accordance with applicable State of California licensure requirements. • Community Paramedics. Community paramedics must be licensed, certified, and accredited in accordance with applicable State of California licensure requirements.

Additional questions can be directed to Melissa Clavel, MPA, CHC mclavel@co.sutter.ca.us or Kristine Hughes, LMFT khughes@co.sutter.ca.us

REFERENCES:

[State Plan Amendment 23-0026; Welfare and Institutions \(W&I\) Code Section 14184.102, subdivision \(d\)](#)

DHCS, BHIN #24-0023, Standards for Specific Behavioral Health Provider Types and Services; Amends Relevant Sections Within Title 9 and Title 22 of the California Code of Regulations (CCR).