

Behavioral Health Services (BHS) – Information Notice

To:	Substance Use Disorder (SUD) Contracted Service Providers
From:	Behavioral Health Services
Date:	June 14, 2022
Title	CalAIM Documentation Reform BHS Plan

The Department of Health Care Services (DHCS) released the final Behavioral Health Information Notice (BHIN) regarding documentation reform, [BHIN 22-019 \(ca.gov\)](#) effective July 1, 2022. The aim of this notice is to reform behavioral health documentation requirements to improve beneficiary experience by streamlining and standardizing clinical documentation requirements across Medi-Cal SMHS, DMC, and DMC-ODS services.

DHCS has recognized the complexity of these updates and how much effort will be needed on the part of counties to ensure that the changes are made in a thoughtful manner with attention to provider and beneficiary impacts. The County of San Diego (County) is expected to have policies and procedures in place for implementation by July 1, 2022. DHCS has identified September 30, 2022, as the delivery date for many of the related deliverables. With this in mind, the County will continue to work strategically to roll out the new requirements.

Assessment:

The County is analyzing current assessment forms and comparing them to the required American Society of Addiction Medicine (ASAM) criteria assessment referenced in the BHIN to determine next steps. We are currently looking at assessment timeline requirements that may impact forms utilized. It was confirmed that the current ASAM assessment form that was developed is specific to adults and there is not a timeline for when a youth specific version will be available. As a result, we are working to identify a phased approach to support assessment updates.

Problem List/Treatment Plan:

The development of the required Problem List is currently being explored for integration for SanWITS users, which will then determine next steps and timelines. This will be done with the same intent as the assessments, with a focus on ease of burden on beneficiaries and providers. For those programs/services which continue to require a treatment plan, the current treatment plan format in SanWITS is being reviewed to determine if modifications – such as embedding a Problem List as part of the treatment plan – is in line with regulations and meets CalAIM expectations. In the meantime, we will be developing a paper format of the Problem List that will be available for use.

Progress Notes:

Progress Note templates are currently being reviewed. We recognize that the requirement for progress notes to be completed within three business days for outpatient programs, or daily for residential programs, is of concern to the system of care. We want to ensure there is understanding that the updated documentation standards must be in place before programs will likely be able to meet this timeline.

As updates are made, notification will be released to the system of care and CalAIM topics will continue to be addressed in various meetings. If you have input or need information on the available venues for discussion, please reach out to QI Matters, see email link below.

For More Information:

- HHSa, QI Matters: QIMatters.HHSa@sdcountry.ca.gov