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**SAPC BULLETIN NO. 19-07**  
***Supersedes Bulletin 19-02 Issued***  
***on March 22, 2019***

November 7, 2019

**TO:** Los Angeles County Substance Use Disorder  
Contracted Treatment Providers

**FROM:** Gary Tsai, M.D., Interim Division Director   
Substance Abuse Prevention and Control

**SUBJECT: PROVIDER STAFFING GUIDELINES**

The Department of Public Health, Substance Abuse Prevention and Control (SAPC) is issuing this bulletin to mandate that specific treatment staffing levels must be met in order to provide and bill for services under the Drug Medi-Cal Organized Delivery System (DMC-ODS).

Attached is the Provider Staffing Guidelines Grid, which includes:

- Staffing level/s that can conduct each of the Substance Use Disorder (SUD) Treatment Services
- Quality Improvement and Utilization Management (QI and UM) requirements across all levels of care and benefits
- Billing Codes (HCPCS)
- Glossary of Terms
- List of Licensed Practitioners of the Healing Arts (LPHA), including the specific definition for license-eligible LPHAs
- Recommended activities for Medical Directors
- Minimum Qualifications for newly hired and existing Registered SUD Counselors that became effective FY 2018-2019

Providers should refer to the SAPC Provider Manual for more information on the staffing requirements, and the SAPC website regularly for the most current version of the provider staffing grid.

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If you have any questions or need additional information, please contact David Hindman, Ph.D., Chief, Clinical Standard and Training Unit, at (626) 299-3549.

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Attachment

**Department of Public Health, Substance Abuse Prevention and Control (SAPC)  
Provider Staffing Level Requirements for Delivery and Oversight of Treatment Services**

Effective 7/1/19

BENEFIT PACKAGE COMPONENTS			STAFF LEVEL						
HCPCS	Description		Trained Support Staff <sup>1</sup>	Registered SUD Counselor <sup>2</sup>	Certified SUD Counselor <sup>3</sup>	LPHA & License-Eligible LPHA <sup>4</sup>	Medical Director <sup>5</sup>	APPLICABLE ASAM LEVELS OF CARE AND OTHER BENEFITS <sup>6</sup>	
Substance Use Disorder (SUD) Treatment Services	H0049	Screening		✓	✓	✓	✓	AR <sup>7</sup> , CENS <sup>8</sup> , OP, IOP, R, WM, OTP	
	H0001	Intake Forms and Documents		✓	✓	✓	✓	AR <sup>7</sup> , OP, IOP, R, WM, OTP, FBS	
	H0001	ASAM Assessment	Assess		✓	✓	✓	✓	AR <sup>7</sup> , OP, IOP, R, WM, OTP, FBS
			Sign			✓	✓		
	T1007	Treatment Plan	Develop, Update, Review, Sign		✓	✓	✓	✓	AR <sup>7</sup> , OP, IOP, R, WM, OTP, FBS
			Sign without MAT				✓	✓	
			Sign with MAT <sup>9</sup> (OTP settings)				✓ MD/DO, and qualified NP and PA only	✓	
			Sign with MAT <sup>9</sup> (non-OTP settings)				✓	✓	
	H0005	Group Counseling		✓	✓	✓	✓	AR <sup>7</sup> , OP, IOP, R, WM, OTP, FBS, RSS	
	T1012	Patient Education		✓	✓	✓	✓	AR <sup>7</sup> , OP, IOP, R, WM, OTP, FBS	
	H0004	Individual Counseling		✓	✓	✓	✓	AR <sup>7</sup> , OP, IOP, R, WM, OTP, FBS, RSS	
	H2011	Crisis Intervention		✓	✓	✓	✓	OP, IOP, R, WM, OTP, FBS	
	90846	Family Therapy				✓	✓	OP, IOP, R, WM, OTP, FBS	
T1006	Collateral Services		✓	✓	✓	✓	OP, IOP, R, WM, OTP, FBS		
T2001	Non-Emergency Transportation		✓	✓	✓	✓	AR <sup>7</sup> , OP, IOP, R, WM, OTP, FBS, RSS		

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H2010	Medication Services <sup>10</sup>			✓	✓	✓	✓	OP, IOP, WM, OTP
H2010	Safeguarding Medications		✓ LVN, LPT, & MA only with IMS approval from DHCS	✓	✓	✓	✓	R
	Medications for Addiction Treatment <sup>11</sup>	Order				✓ MD/DO, qualified NP and PA only	✓	OP, IOP, R, WM, OTP
		Prescribe (methadone)				✓ MD/DO only	✓	OTP
		Prescribe (buprenorphine)				✓ MD/DO, qualified NP and PA only	✓	OP, IOP, R, WM, OTP
		Prescribe (other MAT options)				✓ MD/DO, qualified NP and PA only	✓	OP, IOP, R, WM, OTP
		Monitor				✓ MD/DO, qualified NP and PA only	✓	OP, IOP, R, WM, OTP
H0020	Methadone Dispensing		✓ LVN			✓ MD/DO, qualified NP, PA, and RN	✓	OTP
S5000	Naltrexone-Generic Dispensing	Tablet	✓ LVN			✓ MD/DO, qualified NP, PA, and RN	✓	OP, IOP, WM
		Extended-Release Injectable	✓ LVN			✓ MD/DO, qualified NP, PA, and RN	✓	OP, IOP, WM, OTP
S5000	Buprenorphine-Generic Dispensing		✓ LVN			✓ MD/DO, qualified NP, PA, and RN	✓	OP, IOP, R, WM, OTP
S5000	Disulfiram-Generic Dispensing		✓ LVN			✓ MD/DO, qualified NP, PA, and RN	✓	OP, IOP, R, WM, OTP
S5000	Naloxone Dispensing		* Self-Administered (patient or bystander)	* Self-Administered (patient or bystander)	* Self-Administered (patient or bystander)	* Self-Administered (patient or bystander)	* Self-Administered (patient or bystander)	OP, IOP, R, WM, OTP

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Substance Use Disorder (SUD) Treatment Services	H0014-1	Ambulatory Detoxification without Extended Onsite Monitoring			✓ (SUD counselors must operate within their scope of practice if MAT is offered)	✓ (SUD counselors must operate within their scope of practice if MAT is offered)	✓ (Non-medical professionals must operate within their scope of practice if MAT is offered)	✓	1-WM (without extended monitoring)
	H0014-1	Ambulatory Withdrawal Management with Extended Onsite Monitoring			✓ (SUD counselors must operate within their scope of practice if MAT is offered)	✓ (SUD counselors must operate within their scope of practice if MAT is offered)	✓ (Non-medical professionals must operate within their scope of practice if MAT is offered)	✓	2-WM (with extended monitoring)
	H0012	Subacute Detoxification Residential with Clinical Management			✓ (SUD counselors must operate within their scope of practice if MAT is offered)	✓ (SUD counselors must operate within their scope of practice if MAT is offered)	✓ (Non-medical professionals must operate within their scope of practice if MAT is offered)	✓	3.2-WM
	H0010	Subacute Detoxification Inpatient with Medical Monitoring			✓ (SUD counselors must operate within their scope of practice if MAT is offered)	✓ (SUD counselors must operate within their scope of practice if MAT is offered)	✓ (Non-medical professionals must operate within their scope of practice if MAT is offered)	✓	3.7-WM
	H0011	Acute Detoxification Inpatient with Medical Management			✓ (SUD counselors must operate within their scope of practice if MAT is offered)	✓ (SUD counselors must operate within their scope of practice if MAT is offered)	✓ (Non-medical professionals must operate within their scope of practice if MAT is offered)	✓	4-WM
	D0001	Discharge Services	Develop		✓	✓	✓	✓	OP, IOP, R, WM, OTP, FBS
			Sign		✓	✓	✓	✓	
	H0048	Alcohol/Drug Testing		✓	✓	✓	✓	✓	OP, IOP, R, WM, OTP
	H0006	Case Management			✓	✓	✓	✓	AR <sup>7</sup> , OP, IOP, R, WM, OTP, FBS, RSS

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<b>SUD Services</b>	H0038-R	Recovery Monitoring		✓	✓	✓	✓	RSS, FBS
	H0038-S	Substance Abuse Assistance		✓	✓	✓	✓	RSS, FBS
	H2034	Recovery Bridge Housing (House Managers <sup>12</sup> )	✓	✓	✓	✓	✓	RBH
<b>QI and UM Requirements</b>	-	Appeals Filing		✓	✓	✓	✓	AR <sup>7</sup> , OP, IOP, R, WM, OTP, FBS, RSS
	-	Authorization Request: MAT for clients under 18		✓	✓	✓	✓	Youth MAT
	-	Authorization Request: Recovery Bridge Housing		✓	✓	✓	✓	OP, IOP, OTP, 1-WM
	-	Authorization Request: WM for clients under 18		✓	✓	✓	✓	Youth WM
	-	DMC Benefit Verification <sup>13</sup>	✓	✓	✓	✓	✓	AR <sup>7</sup> , OP, IOP, R, WM, OTP, FBS, RSS
	-	Medical Necessity Determination				✓	✓	AR <sup>7</sup> , OP, IOP, R, WM, OTP, FBS, RSS
	-	Progress Note w/o Co-Signature		✓	✓	✓ (License only)	✓	AR <sup>7</sup> , OP, IOP, R, WM, OTP, FBS, RSS
	-	Pre-Authorization Request: Residential Services		✓	✓	✓	✓	R

## GLOSSARY OF TERMS

<sup>1</sup> **Trained Support Staff:** Non-professional staff including clerical, billing and facility management support, who have received appropriate onsite orientation and training prior to performing assigned duties. Non-professional staff will be supervised by professional and/or administrative staff. *[Drug Medi-Cal Organized Delivery System (DMC-ODS) Special Terms and Conditions]*

<sup>2</sup> **Registered Substance Use Disorder (SUD) Counselor:** A provider staff who has registered to fulfill the requirements of becoming a Certified SUD Counselor with any of the agencies accredited by the National Commission for Certifying Agencies (NCCA) and recognized by the California Department of Health Care Services (DHCS), which is limited to the California Association for Alcohol and Drug Educators (CAADE), California Association of DUI Treatment Programs (CADTP) and the California Consortium of Addiction Programs and Professionals (CCAPP) unless otherwise modified by DHCS via an Information Notice. *[DHCS; California Code of Regulations, Title 9].*

To be able to conduct services under Los Angeles County's Substance Use Disorder (SUD) Treatment System, registered SUD counselors must comply with the following training requirements and deadlines:

1. Complete the State-required American Society of Addiction Medicine (ASAM) A and ASAM B trainings prior to delivering reimbursable treatment services; **AND**
2. Complete training on Cognitive Behavioral Therapy (CBT), Motivational Interviewing (MI), clinical documentation, and treatment planning either through a qualified Continuing Education Unit (CEU) agency such as UCLA-ISAP and CIBHS, or a qualified trainer funded by a Network Treatment Provider; **AND**
3. Complete one (1) classroom courses equaling a minimum of 45 hours of formal instruction in a CAADE-, CCAPP- or CADTP-approved SUD education program on relevant SUD related topics within 12 months of the counselor's first day of employment and annually thereafter until certified (Note: Typically, one academic course is equal to three (3) hours of classroom instruction per week for one academic semester); **AND**
4. Complete the Certification process within five (5) years, unless qualified for a hardship extension which can extend registered status for an additional one (1) year.

Proof of completion must be documented in staff files and shared with SAPC staff upon request. Proof of completion may include letters from school administrators, certificates, and school transcripts. ***If required education/trainings are not completed within required timeframes, services will not be paid by SAPC and will be eligible for recoupment.***

***Requirements for students/interns/trainees: For students/interns/trainees actively enrolled in graduate treating programs (and thereby not generally eligible to be registered with their state boards) can provide billable services if registered with a SUD counselor certifying agency recognized by DHCS. Students/interns/trainees who retain active enrollment and attendance in their graduate training program are exempt from training requirements #2, #3, and #4. If a student/intern/trainee is no longer actively enrolled or attending their graduate training program and has not matriculated to License-Eligible LPHA or LPHA status with five (5) years of registration, they will immediately be subject to the training requirements for all other Registered Counselors as outlined above.***

<sup>3</sup> **Certified Substance Use Disorder (SUD) Counselor:** A provider staff who has been certified by one of the agencies accredited by the NCCA and recognized by DHCS, which include CAADE, CADTP and CCAPP unless otherwise modified by DHCS via an Information Notice. [DHCS; CCR, Title 9].

To be able to conduct services under Los Angeles County's SUD Treatment System, certified SUD counselors must comply with the following training requirements and deadlines:

1. Complete the State-required ASAM A and ASAM B trainings prior to delivering reimbursable treatment services; **AND**
2. Provide proof of training on CBT, MI, clinical documentation, and treatment planning from a CAADE, CADTP, or CCAPP associated educational institution, qualified training institution offering CEUs (e.g., UCLA-ISAP and CIBHS), or a qualified trainer funded by a Network Treatment Provider.

Proof of completion must be documented in staff files and shared with SAPC staff upon request. Proof of completion may include letters from school administrators, certificates, and school transcripts. ***If required education/trainings are not completed within required timeframes, services will not be paid by SAPC and will be eligible for recoupment.***

<sup>4</sup> **LPHA:** Licensed Practitioner of the Healing Arts comprise the following clinical professionals: physicians (MD or DO); nurse practitioners (NP); physician assistants (PA); registered nurses (RN); registered pharmacists (RP); licensed clinical psychologists (LCP); licensed clinical social workers (LCSW); licensed professional clinical counselors (LPCC); licensed marriage and family therapists (LMFT); and license-eligible LPHAs. The LPHAs must provide services, and receive supervision required under their respective scope of practice laws. [DMC-ODS Special Terms and Conditions].

To be considered a **License-eligible LPHA** under the California (CA) Medi-Cal 2020 Demonstration, an individual must have already earned their advanced degree and be registered with the State-licensing authority for the respective field to obtain supervised clinical hours for licensure. This includes the following: Registered Psychologist, Psychological Assistant, Associate Social Worker (ASW), Registered Associate Marriage and Family Therapy (AMFT), Registered Associate Professional Clinical Counselor (APCC) and Psychological Assistants.

- For a psychologist candidate (governed by the CA Board of Psychology – CABOP), “licensed eligible” is one who is gaining experience required for licensure as either (1) a Psychological Assistant (pre-doctoral or post-doctoral) or (2) as a Registered Psychologist, in accordance with applicable statutes and regulations. In either case, the candidate must be appropriately registered with the CA Board of Psychology prior to delivering services and working under appropriate supervision of a licensed psychologist or a physician board certified in psychiatry.
- For a social worker candidate, a marriage and family therapy candidate, or a professional clinical counselor candidate (governed by the CA Board of Behavioral Sciences – BBS), “licensed eligible” is one registered with the BBS for the purpose of acquiring the experience related for licensure, in accordance with applicable statutes and regulations. This includes registration as either an ASW, AMFT, or APCC. In each case, candidates must be appropriately registered with the BBS prior to delivering services and working under appropriate supervision of a licensed mental health professional, including a LCSW, LMFT, LPCC, and licensed psychologist or a physician board certified in psychiatry.

Non-registered students, interns, or trainees (i.e., those who have not yet received their advanced degree in the respective field and do not have registration with the appropriate state board) are not considered License-eligible LPHAs. For this reason, (1) these individuals cannot perform



the duties of a License-eligible LPHA (e.g., sign-off on a treatment plan) and (2) network providers cannot submit claims for treatment services delivered by these individuals. **However, non-registered students/interns/trainees can provide billable services if registered with a SUD counselor certifying agency recognized by DHCS and remain actively enrolled and attending a graduate training program (see “Registered Counselor”).** Even though registered counselors are able to provide many services without an LPHA’s co-signature, because student/interns/trainees are working to earn graduate credit, these providers are required to have co signatures on all their clinical documentation and receive weekly supervision. At a minimum, consistent with State-licensing authorities, this supervision requirement consists of one hour of individual supervision or two hours of group supervision for every 10 hours of direct clinical service provided by the student, intern or trainee.

To be able to conduct services under Los Angeles County’s SUD Treatment System, LPHAs – inclusive of License-eligible LPHAs – must comply with the following training requirements and deadlines:

1. Complete the State-required ASAM A and ASAM B trainings by the Change Companies prior to delivering reimbursable treatment services; **AND**
2. Complete a minimum of five (5) hours of continuing education related to addiction every two (2) years.

Proof of completion must be documented in staff files and shared with SAPC staff upon request. Proof of completion may include letters from school administrators, certificates, and school transcripts. ***If required education/trainings are not completed within required timeframes, services will not be paid by SAPC and will be eligible for recoupment.***

<sup>5</sup> **Medical Director:** A physician is required of all provider agency sites and must have 1) enrolled with DHCS under applicable state regulations; 2) been screened in accordance with 42 Code of Federal Regulations (CFR) 455.450(a) as a “limited” categorical risk within a year prior to serving the position; and 3) signed a Medicaid provider agreement with DHCS as required by 42 CFR 431.107. *[DMC-ODS Special Terms and Conditions]*

Whenever possible, it is recommended that Medical Directors at SUD provider agencies perform functions that others within the agency are unable to optimally perform. As such, some recommended responsibilities of Medical Directors to maximize their benefit and role within the SUD system of care include:

- Providing Medications for Addiction Treatment (MAT), when clinically necessary
- Providing withdrawal management when clinically necessary
- Providing clinical supervision for staff
- Referring/treating co-occurring physical and mental health conditions
- Assisting other professional staff with challenging cases (e.g., refractory SUD, co-occurring conditions, certain special populations)
- Leading Quality Improvement (QI) functions/projects (e.g., QI Projects, leading clinical team meetings, etc.)
- Conducting clinical trainings on issues relevant to professional staff (e.g., documentation, ASAM Criteria, DSM-5, MAT, and co-occurring mental health conditions)
- Providing physical exams, when necessary and appropriate at their facility.

Minimum expectations for Medical Directors within the specialty SUD system include: complying with clinical standards of best practice, licensing, accreditation standards and other local, state, and federal regulatory and reporting requirements; interpreting and supporting standards and requirements to others; researching and maintaining knowledge of evidenced-based practices, as well as updates regarding treatment of SUD

and recovery-based services; and participating in SAPC-related meetings (e.g., Medical Director meetings, provider meetings, etc.).

<sup>6</sup> **Applicable American Society of Addiction Medicine (ASAM) levels of care (LOC)** include: ASAM 1.0 Outpatient for At-Risk Youth and Young Adults (AR), ASAM 1.0 Outpatient (OP); ASAM 2.1 Intensive Outpatient (IOP); ASAM 3.1, 3.3, 3.5 Residential (R); ASAM 1, 2, 3.2, 3.7, 4 Withdrawal Management (WM); and ASAM 1 Opioid (Narcotic) Treatment Program (OTP). **Other benefits** include: Client Engagement and Navigation Services (CENS); Medication-for Addiction Treatment (MAT); Recovery Support Services (RSS); and Field-Based Services (FBS).

<sup>7</sup> **At-Risk:** Youth (age 12 – 17) or young adults (age 18 – 20) may be determined to be “at-risk” if they meet the following criteria: 1) Substance use does NOT meet the minimum criteria for a SUD from the DSM-5 (with the exception of Tobacco-Related Disorders and Non-Substance-Related Disorders); and 2) Determined to be at-risk of developing a substance use disorder based on reports of experimental or early-phase substance use, associated biopsychosocial risk factors, and information gathered from the full ASAM Continuum or SAPC Youth ASAM assessment and At-Risk Determination Tool.

<sup>8</sup> **CENS:** The Client Engagement and Navigation Services serve as a liaison between involved State or County partners (e.g., courts) and the specialty SUD system to provide high-touch (e.g., face-to-face) interaction with patients to facilitate access to and completion of SUD treatment.

<sup>9</sup> **Treatment Plan Signing (with MAT):** When Medications for Addiction Treatment (MAT) are included in the Treatment Plan in OTP settings, LPHAs who sign off on Treatment Plans must be licensed prescribers. When MAT is included in the Treatment Plan in non-OTP settings, LPHAs who sign off on the Treatment Plan can be licensed prescribers, but do not need to be.

<sup>10</sup> **Medication Services:** The prescription or administration of medication related to SUD treatment services, or the assessment of the side effects or results of that medication conducted by staff lawfully authorized to provide such services and/or order laboratory testing within their scope of practice or licensure. In residential facilities, this includes storing all resident medication, and facility staff members may assist with patient's self-administration of medication.

<sup>11</sup> **Medications for Addiction Treatment (MAT):** The use of medications, in combination with counseling and behavioral therapies, to comprehensively treat SUD and provide a whole-patient approach to treatment that includes addressing the biomedical aspects of addiction. Physicians and licensed prescribers in DMC programs will be reimbursed through the general Fee-for-Service (FFS) Medi-Cal system for the ordering, prescribing, administering, and monitoring of MAT, other than MAT provided in OTP settings, which will be reimbursed through the DMC system. *[DMC-ODS Special Terms and Conditions]*

With the exception of Methadone, which can only be provided in OTP settings, MAT can be offered in residential treatment settings with approval for Incidental Medical Services (IMS) from DHCS. However, MAT services provided in residential treatment settings are not reimbursable by SAPC under the DMC-ODS.

<sup>12</sup> **Recovery Bridge Housing (RBH) Housing Managers:** At minimum, a trained support staff will oversee the daily operation of the RBH facility; implement RBH policies, procedures, rules, and requirements; ensure the quality of the facility, and the health and safety of RBH residents. At a minimum, training for this trained support staff will include: basic first aid, CPR, naloxone and drug overdose, and blood-borne illnesses. RBH Housing Managers will provide random inspections of the RBH facility to ensure compliance with specified RBH policies, procedures, rules, and requirements. RBH House Managers may also assist in the chores/maintenance of the residents' home. All residents will be provided an emergency contact number that will allow them to speak with a “live” individual twenty-four hours per day, seven days per week (24/7). As such, RBH facilities must

have a staff member available on-call 24/7 who is available to address immediate needs of RBH residents and appropriately triage emergencies that may arise. The Housing Manager is allowed to manage up to five sites and/or live on-site. If the Housing Manager is not accessible to address the immediate needs of residents during a crisis, a trained staff must be available.

The RBH Housing Manager must not be an RBH beneficiary. Each agency has the discretion to provide on-site, live-in staffing or off-site staffing who oversee the location(s). The Housing Manager is allowed to live on site as long as they do not occupy a SAPC-contracted bed.

<sup>13</sup> **DMC Benefit Verification:** To be eligible for DMC-reimbursed treatment services, individuals must be confirmed to 1) reside within Los Angeles County; 2) have Medi-Cal and benefits assigned to Los Angeles County; and 3) meet the medical necessity criteria. Participants of My Health LA who meet medical necessity criteria receive the same benefit package, but services are reimbursed through non-federal funding sources.