



**BARBARA FERRER, Ph.D., M.P.H., M.Ed.**  
Director

**JEFFREY D. GUNZENHAUSER, M.D., M.P.H.**  
Interim Health Officer

**CYNTHIA A. HARDING, M.P.H.**  
Chief Deputy Director

**JOHN M. CONNOLLY, Ph.D., M.S.Ed.**  
Interim Division Director, Substance Abuse Prevention and Control  
1000 South Fremont Avenue, Building A-9 East, 3rd Floor  
Alhambra, CA 91803  
TEL (626) 299-4101 • FAX (626) 458-7637

[www.publichealth.lacounty.gov](http://www.publichealth.lacounty.gov)

**BOARD OF SUPERVISORS**

- Hilda L. Solis**  
First District
- Mark Ridley-Thomas**  
Second District
- Sheila Kuehl**  
Third District
- Janice Hahn**  
Fourth District
- Kathryn Barger**  
Fifth District

**SAPC BULLETIN NO. 18-02-START**  
**Superseded by Bulletin No. 19-02**

April 20, 2018

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

**FROM:** John M. Connolly, Ph.D., M.S.Ed. 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 System Transformation to Advance Recovery and Treatment, Organized Delivery System (START-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 licensed-eligible LPHAs
- Recommended activities for Medical Directors
- Minimum Qualifications for Registered SUD Counselors beginning FY 2018-2019

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

If you have any questions or need additional information, please contact Dr. David Hindman, from Clinical Standards and Training, at (626) 299-3549.

JMC:cw  
18-34576

Attachment



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

BENEFIT PACKAGE COMPONENTS			STAFF LEVEL					APPLICABLE ASAM LEVELS OF CARE AND OTHER BENEFITS <sup>6</sup>
HCPCS	Description		Trained Support Staff <sup>1</sup>	Registered SUD Counselor <sup>2</sup>	Certified SUD Counselor <sup>3</sup>	LPHA & Licensed-Eligible LPHA <sup>4</sup>	Medical Director <sup>5</sup>	
H0049	Screening			✓	✓	✓	✓	AR, CENS <sup>8</sup> , OP, IOP, R, WM, OTP
H0001	Intake Forms and Documents			✓	✓	✓	✓	AR, OP, IOP, R, WM, OTP, FBS
H0001	ASAM Assessment	Assess		✓	✓	✓	✓	AR, OP, IOP, R, WM, OTP, FBS
		Sign				✓	✓	
T1007	Treatment Plan	Develop, Update, Review, Sign		✓	✓	✓	✓	AR, OP, IOP, R, WM, OTP, FBS
		Sign without MAT (mandatory)				✓	✓	
		Sign with MAT <sup>9</sup> (mandatory)				✓ MD/DO, and qualified NP and PA only	✓	
H0005	Group Counseling			✓	✓	✓	✓	AR, OP, IOP, R, WM, OTP, FBS, RSS
T1012	Patient Education			✓	✓	✓	✓	AR, OP, IOP, R, WM, OTP, FBS
H0004	Individual Counseling			✓	✓	✓	✓	AR, 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, OP, IOP, R, WM, OTP, FBS, RSS



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

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 & Licensed-Eligible LPHA <sup>4</sup>	Medical Director <sup>5</sup>	APPLICABLE ASAM LEVELS OF CARE AND OTHER BENEFITS <sup>6</sup>
H2010	Medication Services <sup>10</sup>			✓	✓	✓	✓	OP, IOP, WM, OTP
H2010	Safeguarding Medications		✓ LVN and MA only with IMS approval from DHCS	✓	✓	✓	✓	R
	Medication-for Addiction Treatment <sup>11</sup>	Order				✓ MD/DO, and qualified NP and PA only	✓	OP, IOP, WM, OTP
		Prescribe (methadone)				✓ MD/DO only	✓	OTP
		Prescribe (buprenorphine)				✓ MD/DO, and qualified NP and PA only	✓	OP, IOP, R, WM, OTP
		Prescribe (other MAT options)				✓ MD/DO, and qualified NP and PA only	✓	OP, IOP, R, WM, OTP
		Monitor				✓ MD/DO, and qualified NP and PA only	✓	OP, IOP, R, WM, OTP
H0020	Methadone Dispensing		✓ LVN			✓ MD/DO, and qualified NP, PA, and RN	✓	OTP
S5000	Naltrexone-Generic Dispensing	Pill	✓ LVN			✓ MD/DO, and qualified NP, PA, and RN	✓	OP, IOP, WM
		Extended-Release Injectable	✓ LVN			✓ MD/DO, and qualified NP, PA, and RN	✓	OP, IOP, WM, OTP
S5000	Buprenorphine-Generic Dispensing		✓ LVN			✓ MD/DO, and qualified NP, PA, and RN	✓	OP, IOP, R, WM, OTP
S5000	Disulfiram-Generic Dispensing		✓ LVN			✓ MD/DO, and qualified NP, PA, and RN	✓	OP, IOP, R, WM, OTP



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

BENEFIT PACKAGE COMPONENTS			STAFF LEVEL					APPLICABLE ASAM LEVELS OF CARE AND OTHER BENEFITS <sup>6</sup>
HCPCS	Description		Trained Support Staff <sup>1</sup>	Registered SUD Counselor <sup>2</sup>	Certified SUD Counselor <sup>3</sup>	LPHA & Licensed-Eligible LPHA <sup>4</sup>	Medical Director <sup>5</sup>	
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
H0014-1	Ambulatory Detoxification			✓ (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
H0012	Subacute Detox Residential			✓ (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 Detox Inpatient			✓ (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 Detox Inpatient			✓ (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)	✓	4.0-WM
D0001	Discharge Planning Services	Develop		✓	✓	✓	✓	OP, IOP, R, WM, OTP, FBS
		Sign		✓	✓	✓	✓	
H0048	Alcohol/Drug Testing		✓	✓	✓	✓	✓	OP, IOP, R, WM, OTP
H0006	Case Management			✓	✓	✓	✓	AR, OP, IOP, R, WM, OTP, FBS, RSS



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

BENEFIT PACKAGE COMPONENTS			STAFF LEVEL					APPLICABLE ASAM LEVELS OF CARE AND OTHER BENEFITS <sup>6</sup>
HCPCS	Description		Trained Support Staff <sup>1</sup>	Registered SUD Counselor <sup>2</sup>	Certified SUD Counselor <sup>3</sup>	LPHA & Licensed-Eligible LPHA <sup>4</sup>	Medical Director <sup>5</sup>	
H0038-R	Recovery Monitoring			✓	✓	✓	✓	RSS, FBS
H0038-S	Substance Abuse Assistance			✓	✓	✓	✓	RSS, FBS
H2034	Recovery Bridge Housing (House Managers <sup>12</sup> )		✓	✓	✓	✓	✓	RBH
QI and UM Requirements	-	Appeals Filing		✓	✓	✓	✓	AR, 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, OP, IOP, R, WM, OTP, FBS, RSS
	-	Medical Necessity Determination				✓	✓	AR, OP, IOP, R, WM, OTP, FBS, RSS
	-	Pre-Authorization Request: Residential Services			✓	✓	✓	✓

**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. *[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 include the California Association of DUI Treatment Programs (CADTP) and the California Consortium of Addiction Programs and Professionals (CCAPP). *[California Department of Health Care Services; California Code of Regulations, Title 9]*



To be able to conduct services under START-ODS, a registered SUD counselor must have completed: 1) At least 3 months of paid or unpaid supervised work experience (including internship/practicum experience) as an SUD counselor in a State-licensed alcohol and other drug treatment facility; 2) 90 hours of approved education in SUD counseling, and one of the following a.) assessment, b.) treatment planning, or c.) case management from an accredited addiction studies program, college or university; and 3) Motivational Interviewing, Cognitive Behavioral Therapy, Medication-Assisted Treatment, and the ASAM Criteria trainings. Education hours must be completed according to the following timeline: 45 hours of approved education in SUD counseling by December 31, 2018, and 45 hours in one (1) of the other three (3) required subject areas by June 30, 2019. These requirements will apply beginning FY 2018-2019.

<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 CADTP and CCAPP; and who must adhere to all requirements in the California Code of Regulations, Title 9, Chapter 8. [*California Department of Health Care Services; California Code of Regulations, Title 9*].

<sup>4</sup> **LPHA:** Abbreviation for Licensed Practitioner of the Healing Arts comprising 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 licensed-eligible LPHAs. The LPHAs must provide services, and receive supervision required under their respective scope of practice laws. [*DMC-ODS Special Terms and Conditions*]. LPHAs must also receive a minimum of five (5) hours of continuing education related to addiction every two (2) years.

To be considered a **licensed-eligible LPHA** under the California 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 (e.g. Registered Psychologist, Psychological Assistant, Associate Social Worker, Registered Associate Marriage and Family Therapy, Registered Associate Professional Clinical Counselor, 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 who is registered with the California Board of Behavioral Sciences for the purpose of acquiring the experience related for licensure, in accordance with applicable statutes and regulations. This includes registration as either an Associate Social Worker (ASW), Registered Associate Marriage and Family Therapist (AMFT), Registered Associate Professional Clinical Counselor (APCC), or Psychological Assistants. In each of these cases, the candidate must be appropriately registered with the CA Board of Behavioral Sciences prior to delivering services and working under appropriate supervision of a licensed mental health professional, including a licensed clinical social worker (LCSW), licensed marriage & family therapist (LMFT), licensed professional clinical counselor (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 licensed-eligible LPHAs. For this reason, (1) these individuals cannot perform the duties of a licensed-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 under START-ODS if they register with a State-recognized SUD counselor certifying agency, which includes CCAPP or CADTP. The requirement for registration for one of these SUD counselors certifying agencies is 9 hours of orientation. 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 1 hour of individual supervision or 2 hours of group supervision for every 10 hours of direct clinical service provided by the student, intern or trainee



<sup>5</sup> **Medical Director:** A physician required of all provider agency sites who serves as the medical director and must 1) have enrolled with DHCS under applicable state regulations; 2) have 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) have 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 Medication-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

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 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).

ASAM 2-WM is not available in FY 2017-2018.

<sup>8</sup> **CENS:** Abbreviation for the Client Engagement and Navigation Services, which 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 are included in the treatment plan, LPHAs who sign off on treatment plans must be licensed prescribers, whether in the opioid treatment program (OTP) setting or non-OTP settings.

<sup>10</sup> **Medication Services:** The prescription or administration of medication related to substance use 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 Drug Medi-Cal (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 under START-ODS.

<sup>12</sup> **Recovery Bridge Housing (RBH) House Managers:** At minimum, a trained support staff who oversee the daily operation of the RBH facility; implement RBH policies, procedures, rules and requirements; and ensure the quality of the facility, and the health and safety of RBH residents. House Managers are not RBH residents themselves and, at minimum, need to be at the facility in the evening and overnight to deliver expected functions.

<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.