## County of San Diego – Health and Human Services Agency (HHSA)

# **Behavioral Health Services (BHS) – Information Notice**





То:	BHS Contracted Mental Health Service Providers
From:	Liberty Donnelly, Acting Assistant Director, Chief Strategy & Finance Officer
Date:	July 3, 2025
Title	Certified AOD Counselor Provision of Specialty Mental Health Services

This memo provides an update regarding the implementation of the Certified alcohol or other drug (AOD) Counselor credential within the Mental Health (MH) system. BHS is currently awaiting further guidance from the Department of Health Care Services (DHCS) to move forward with the next steps needed for integrating this role into contracts and rate schedules moving forward.

### **Background**

Historically, AOD Counselor staff could provide and claim for services within the MH system under the Mental Health Rehabilitation Specialist (MHRS) or Other Qualified Practitioner (OQP) designations, based on their qualifications. They were required to provide services under a primary MH diagnosis and meet specific documentation standards despite the actual "Certified AOD Counselor" taxonomy not being available for use.

The State recently released the FY 2025-26 Specialty Mental Health Services (SMHS) Fee Schedule, which now includes rates for Certified AOD Counselors for various SMHS activities following the approval of a State Plan Amendment (SPA) 24-0042. BHS subsequently incorporated these rates into its own FY 2025-26 fee schedule and shared with providers to reflect locally adopted rates based on the state framework. However, there are outstanding issues that need to be addressed before moving forward:

- 1. **Rate Schedule Alignment**: The current DHCS rate schedule reflects rates for specialty mental health services that do not align with the allowable service components for Certified AOD Counselors outlined in the SPA.
- Documentation and Supervision Requirements: DHCS has not yet provided the required guidelines
  on diagnosis or documentation standards for Certified AOD Counselors and required supervision
  requirements within SMHS roles.
- 3. EHR Updates: SmartCare is in the process of being updated to support appropriate claiming.

#### **Next Steps**

BHS has reached out to DHCS regarding these concerns and will provide further updates. Our goal is to operationalize this new workstream as DHCS direction is received. In the interim, the <u>County FY 2025-26 Rate Schedule</u> posted on <u>Optum</u> was revised to remove the Certified AOD Counselor as a provider type.

#### **Action Items for Providers**

- Pause on Integration of the Certified AOD Counselor Credential: Although this credential may be
  included in the SMHS fee schedule and BHS Invoice/Budget documents, the request is for providers to
  pause on the integration of this credential and not include this credential within proposed budgets or
  submit ARFs to modify staff credentials for this role until further notice.
- Exhibit C: Upon DHCS and County operationalization of Certified AOD Counselor provision of SMHS, the contract Exhibit C will need to be amended to include the provider type prior to provision of services.

#### For More Information:

Contact your Contracting Officer's Representative (COR)

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Additionally, you may have also spotted the addition of Enhanced Community Health Workers (CHWs) within the FY 2025-26 fee schedules and BHS Invoice/Budget documents. Additional guidance on this new credential role and certification requirements will be shared with all providers shortly. Resources will be posted on Optum alongside the impending communication. Providers will be required to consult with CORs to determine if CHWs are suitable for their programs, and Exhibit C will need to be amended to include the provider type prior to provision of services.

### **For More Information:**

Contact your Contracting Officer's Representative (COR)