



August 28, 2023

Ivan Bhardwaj, Chief
Medi-Cal Behavioral Health – Policy Division
California Department of Health Care Services

Sent via email to PublicInput@dhcs.ca.gov

Re: State Plan Amendment 23-0026

Dear DHCS,

The California Alliance of Child and Family Services (The Alliance) is pleased to offer feedback on State Plan Amendment 23-0026. The Alliance represents 160 non-profit nationally-accredited community-based organizations serving children, youth, and families in public human services systems.

We Strongly Support the Clarification that “Clinical Trainees” May Provide Clinical Services.

We are very pleased to see that the proposed State Plan Amendment (SPA) allows graduate students studying to become a Licensed Mental Health Professional, now called “Clinical Trainees,” to provide assessment, rehabilitation, referral and linkages, therapy and treatment planning services. This clarification will help ensure continued access to many essential mental health services.

We Recommend a Clearer Definition of “In the Process of Obtaining Registration” with the BBS.

We are also extremely pleased that Social Welfare Clinician, Marriage and Family Therapist, and Professional Clinical Counselor candidates will be considered “registered” if they are “in the process of obtaining registration” with the Board of Behavioral Sciences (BBS). (See page 2j.) This policy will significantly increase access to much-needed mental health services provided by graduate students, as well as help to ensure the continued viability of graduate student intern programs. This clarification will also bring Medi-Cal billing policies into closer alignment with BBS policies.

We are concerned, however, that different counties may adopt varying interpretations of the phrase “in the process of obtaining registration.” For example, it is unclear whether that term means the applicant has: 1) begun to prepare their application; 2) submitted their application; or 3) received confirmation that the BBS has received their application. To increase clarity and help to ensure that all counties adopt a consistent approach, we suggest aligning this standard with the BBS [90 Day Rule](#), which allows applicants for registration as an Associate MFT, PCC or CSW to count their supervised hours towards licensure **beginning on the date their degree was awarded** (as long as the Associate application is received within 90 days of the award date and the applicant has completed a Live Scan fingerprinting through their employer.) Because the BBS has essentially chosen to recognize new graduates as clinicians beginning on the date their degree was awarded, we encourage DHCS to adopt the same standard for the purposes of the SPA.



If DHCS chooses not to adopt this approach, we would recommend that the SPA state more simply that Clinical Trainees will be considered “registered” as soon as they have submitted their Associate application.

Medical Assistants Should be Able to Work Under the Supervision of an LMHP.

We support the addition of the new provider role of Medical Assistant (MA). This provider type could bill for several types of important activities that typically cannot receive Medi-Cal reimbursement, such as “administrative, clerical, and technical supportive services.”

If DHCS chooses to add the position of MA, however, we would urge DHCS to make this provider type equally available to both behavioral health and physical health providers. In the proposed draft SPA, MAs must be supervised by a “physician and surgeon” who is physically present (or a Nurse Practitioner or Physician’s Assistant to whom the physician and surgeon has given supervisory authority.) Because very few Specialty Mental Health Services (SMHS) programs need to have a surgeon on staff, the new MA role would not be available to most SMHS providers. In order to ensure that the SPA meets Mental Health Parity requirements, and to help more SMHS providers obtain reimbursement for necessary administrative activities, we would encourage DHCS to allow Medical Assistants to be supervised as well by any LMHP.

Typographical error

Page 3 of the draft SPA appears to have a typographical error. It states it is “Page 2j” at the top of the and “Page 2K” at the bottom of the page.

Thank you for the opportunity to provide comments on State Plan Amendment 23-0026. We look forward to continued discussions with DHCS.

Sincerely,

A handwritten signature in black ink that reads "Adrienne Shilton". The signature is written in a cursive, flowing style.

Adrienne Shilton
Director of Public Policy and Strategy