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February 13, 2018

SAPC BULLETIN NO. 17-13-START

TO: Los Angeles County Substance Use Disorder
Contracted Treatment Providers

FROM: Wesley L. Ford, M.A., M.P.H., Division Director
Substance Abuse Prevention and Control

SUBJECT: OPIOID TREATMENT PROGRAM REQUIREMENTS

Under Los Angeles County’s Substance Use Disorder Organized Delivery System (START-ODS), Opioid Treatment Programs (OTP) must continue to abide by Title 9 and Title 22 requirements, along with other requirements specific to Drug Medi-Cal (DMC) as of the launch of START-ODS on July 1, 2017. This bulletin serves to communicate key information regarding requirements in OTP settings.

INITIAL ASAM ASSESSMENT

The DMC regulations of START-ODS require OTPs to perform an initial American Society of Addiction Medicine (ASAM) assessment for all eligible patients (Medi-Cal, My Health LA, and participants of other County funded programs [AB109, CalWORKS, etc.]) served within SAPC’s network. To assist OTP providers with this requirement, the California Department of Health Care Services (DHCS) accepted the Substance Abuse Prevention and Control’s (SAPC) proposal to gradually transition OTPs to this requirement by allowing OTPs six (6) months to comply with this requirement, from July 1, 2017 to December 31, 2017. DHCS subsequently granted an extension until March 15, 2018 to give OTPs additional time to complete initial ASAM assessments for all of their patients.

This bulletin serves to clarify that OTP providers are required to complete initial ASAM assessments for all of their patients. For patients who were admitted to treatment prior to the implementation of START-ODS on July 1, 2017, OTP providers have until March 15, 2018 to complete ASAM assessments for this group of patients. Reimbursement for cases in which ASAM assessments are not completed by this date will be subject to recoupment.

ANNUAL JUSTIFICATION

Consistent with Title 9 requirements, OTP providers must perform an annual justification for patients who need ongoing OTP care. Similarly, DMC requires that OTP providers re-verify DMC eligibility for patients every 12 months, which involves re-verifying county of residence in Los Angeles County and medical necessity. To re-verify medical necessity, DHCS has clarified that an annual ASAM assessment is not required and that a narrative justification of the ongoing need for OTP services can serve as the requirement to re-establish medical necessity every 12 months in OTP settings.

This bulletin serves to clarify that the annual justification required by Title 9 and the annual justification to re-establish medical necessity every 12 months for DMC are one in the same. OTP providers do not need to perform two separate annual justifications.

In summary, with regard to the initial ASAM assessment required by DMC and the annual justifications required by both DMC and Title 9, OTP providers will remain in compliance with these State requirements if they:

1. Complete initial ASAM assessments for all of their patients by March 15, 2018; and
2. Complete an annual justification for the need for ongoing OTP services for all of their patients, starting from their treatment admission date.

If you have any questions or need additional information, please contact your Contract Program Auditor.

WLF:dd