



State of California—Health and Human Services Agency  
Department of Health Care Services



GAVIN NEWSOM  
GOVERNOR

DATE: September 2, 2021

Behavioral Health Information Notice No: 21-054

TO: California Alliance of Child and Family Services  
California Association for Alcohol/Drug Educators  
California Association of Alcohol & Drug Program Executives, Inc.  
California Association of DUI Treatment Programs  
California Association of Social Rehabilitation Agencies  
California Consortium of Addiction Programs and Professionals  
California Council of Community Behavioral Health Agencies  
California Hospital Association  
California Opioid Maintenance Providers  
California State Association of Counties  
Coalition of Alcohol and Drug Associations  
County Behavioral Health Directors  
County Behavioral Health Directors Association of California  
County Drug & Alcohol Administrators

**Subject:** Clarification of Mental Health Plan (MHP) responsibility for treatment of beneficiaries with mental health conditions after COVID-19 infection

**References:** [California Code of Regulations \(CCR\), Title 9, Chapter 11, Sections 1820.205, 1830.205, and 1830.210;](#)  
[BHIN 20-043](#)

**Purpose:** To provide guidance on MHP responsibility for specialty mental health services (SMHS) for Medi-Cal beneficiaries with mental health conditions after COVID-19 infection.

**Background:**

Recent studies show that COVID-19 infection may increase the risk of developing mental health conditions. Mental health conditions may also occur after a COVID-19 infection, and may be unrelated to the infection and the physiologic impact on a beneficiary. DHCS has been asked to clarify whether beneficiaries with mental health conditions occurring after COVID-19 infection may receive specialty mental health services, given that current medical necessity criteria exclude conditions that would be

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otherwise responsive to physical health treatment. (CCR, tit. 9, §§ 1830.205, subd. (b), par. (3), subpar. (C), 1830.210, subd. (a), par. (2).)

**POLICY CLARIFICATION:**

Through this Behavioral Health Information Notice (BHIN), DHCS is clarifying that MHPs are required to provide or arrange and pay for medically necessary SMHS for beneficiaries, regardless of a prior diagnosis of COVID-19 infection, since a previous history of a medical condition may or may not be related to current mental health signs and symptoms.

The enclosure to BHIN 20-043 identifies the ICD-10 diagnosis codes that MHPs may use to submit claims for SMHS to receive reimbursement of Federal Financial Participation (FFP). MHPs must provide or cover SMHS for a beneficiary with a Post-COVID mental health diagnosis who meets current medical necessity criteria for SMHS.

If a beneficiary's condition does not meet medical necessity criteria, then FFP is not available.

Please direct any questions to [countysupport@dhcs.ca.gov](mailto:countysupport@dhcs.ca.gov).

Sincerely,

Original signed by

Kelly Pfeifer, M.D.  
Deputy Director  
Behavioral Health