



MICHELLE BAASS
DIRECTOR

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



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DATE:

Behavioral Health Information Notice No: 22-050

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: Updated Guidance for CalAIM Behavioral Health Quality Improvement Program (BHQIP)

PURPOSE: This Behavioral Health Information Notice (BHIN) updates BHQIP deliverable submission deadlines, clarifies reporting requirements, and encloses reporting templates for use by participating entities.

REFERENCE: Welfare & Institutions Code sections 14184.102(d); 14184.405(a); [BHIN 21-044](#); [BHIN 21-074](#); [BHIN 22-034](#).

BACKGROUND:

The Behavioral Health Quality Improvement Program (BHQIP) is a program intended to help support the implementation of the [California Advancing and Innovating Medi-Cal Initiative](#)¹ (CalAIM). Medi-Cal behavioral health delivery systems participating in BHQIP, referred to as participating entities, are able to receive incentive payments if they meet specified milestones and deadlines. Meeting the specified BHQIP deadlines means: (1) the participating entity has submitted all BHQIP documentation and deliverables by the deadlines specified by the Department; and (2) DHCS has approved

¹ Welfare & Inst. Code § 14184.405(a)

and determined compliance of the submitted documentation and deliverables with the CalAIM requirements.

Revised rules and deadlines for the submission of deliverables to demonstrate compliance with CalAIM BHQIP are set forth below. The revised due dates specified below shall supersede those originally communicated in the [CalAIM BHQIP Program Implementation Plan and Instructions](#).

POLICY:

Deadline Extensions

Given the status of applicable DHCS guidance, the submission deadlines for select deliverables outlined in **Table 1** below have been extended from September 30, 2022, to March 1, 2023. Participating entities may submit these deliverables by their original due date of September 30, 2022, but no later than March 1, 2023.

The extensions given for the deliverables outlined in **Table 1** shall reduce the number of deliverables required for the entity to achieve its full incentive payment for the September 30, 2022, reporting deadline, and shall increase the number of deliverables required for the entity to achieve its full incentive payment for the March 1, 2023, reporting deadline. Incentive payment allocations and distribution timelines associated with the September 2022 report will not change based on these extensions.

Table 1: Revised Due Dates for Select Deliverables

| <i>Milestone</i> | <i>Deliverable</i> | <i>Original Due Date</i> | <i>New Due Date</i> |
|------------------|--|--------------------------|---------------------|
| Milestone 1a | Deliverable(s) due September 30, 2022, as defined by the participating entity and approved in its BHQIP Implementation Plan. | 09/30/2022 | 03/01/2023 |
| Milestone 1b | Deliverable(s) due September 30, 2022, as defined by the participating entity and approved in its BHQIP Implementation Plan. | 09/30/2022 | 03/01/2023 |
| Milestone 1c | Deliverable(s) due September 30, 2022, as defined by the participating entity and approved in its BHQIP Implementation Plan. | 09/30/2022 | 03/01/2023 |
| Milestone 2a | <u>DHCS-Required Deliverable</u> : Document training plan for all relevant staff (e.g., access line and MHP intake staff) on standardized screening tools. | 09/30/2022 | 03/01/2023 |

| <i>Milestone</i> | <i>Deliverable</i> | <i>Original Due Date</i> | <i>New Due Date</i> |
|------------------|---|--------------------------|------------------------------|
| Milestone 2b | <u>DHCS-Required Deliverable:</u> Document training plan for all relevant staff and subcontracted providers on standardized transition tools. | 09/30/2022 | 03/01/2023 |
| Milestone 2c | <u>DHCS-Required Deliverable:</u> Document training plan for all relevant DMC staff and subcontracted providers. | 09/30/2022 | 09/30/2022* *not extended |
| Milestone 2d | <p><u>DHCS-Required Deliverable:</u> Submit evidence of EHR changes that support documentation reform, such as vendor contracts.</p> <p><u>DHCS-Required Deliverable:</u> Submit updated excerpts from documentation manuals, list of updated participating entity Policies and Procedures, or similar evidence that entities and subcontractors have adopted the MHP, DMC or DMC-ODS revised documentation standards (which include but are not limited to assessment domains, problem lists, progress notes, and applicable timeliness standards).</p> <p><u>DHCS-Required Deliverable:</u> Document training plan inclusive of the new CalAIM policies listed above, and participation of MHP, DMC or DMC-ODS staff and providers in training. Include information on training made available to subcontracted providers and describe how the entity has supported and monitored timely participation in trainings for its subcontractors.</p> | 09/30/2022 | 09/30/2022* *not extended |

| <i>Milestone</i> | <i>Deliverable</i> | <i>Original Due Date</i> | <i>New Due Date</i> |
|------------------|--|--------------------------|------------------------------|
| Milestone 2e | <p><u>DHCS-Required Deliverable:</u> Submit updated policies and procedures reflecting CalAIM behavioral health policy changes listed below:</p> <ul style="list-style-type: none"> • No Wrong Door (SMHS) (BHIN 22-011) • Documentation requirements and assessment standards (SMHS and DMC, DMC-ODS) (BHIN 22-019) <p><u>DHCS-Required Deliverable:</u> Document training plan inclusive of the new CalAIM policies listed below, including participation of staff in training:</p> <ul style="list-style-type: none"> • Criteria for DMC and DMC-ODS services, including use of ASAM criteria in DMC counties, changes to diagnostic, eligibility, and medical necessity requirements, and new processes to claim Medi-Cal reimbursement for early intervention services for youth and for specified EPSDT SUD services in DMC counties (BHIN 21-075) • Criteria to access Specialty Mental Health Services (SMHS) for adults and for children (including criteria related to trauma, child welfare involvement, and homelessness) (BHIN 21-073) • No Wrong Door (SMHS) (BHIN 22-011) • Documentation requirements and assessment standards (SMHS and DMC, DMC-ODS) (BHIN 22-019) | 09/30/2022 | 09/30/2022* *not extended |

| <i>Milestone</i> | <i>Deliverable</i> | <i>Original Due Date</i> | <i>New Due Date</i> |
|------------------|---|--------------------------|------------------------------|
| | <p><u>DHCS-Required Deliverable:</u> Submit updated policies and procedures reflecting all CalAIM behavioral health policy changes listed below:</p> <ul style="list-style-type: none"> • Mandatory screening and transition tools (STT) for specialty and non-specialty mental health <p><u>DHCS-Required Deliverable:</u> Document training plan inclusive of the new CalAIM policies listed below, including participation of staff in training:</p> <ul style="list-style-type: none"> • Mandatory screening and transition tools (STT) for specialty and non-specialty mental health | 09/30/2022 | 03/01/2023 |
| Milestone 3a | <p><u>Option 1: DHCS-Required Deliverable:</u> Attach a copy of signed data-sharing agreement between the participating entity and the MCP(s). Participating entities may submit versions redacting sensitive information.</p> <p><u>or</u></p> <p><u>Option 2: DHCS-Required Deliverable:</u> Attach a copy of a signed Participation Agreement to onboard with an HIE that has signed the California Data Use and Reciprocal Support Agreement (CaDURSA) and joined the California Trusted Exchange Network (CTEN). Participating entities may submit versions redacting sensitive information.</p> | 09/30/2022 | 09/30/2022* *not extended |

| <i>Milestone</i> | <i>Deliverable</i> | <i>Original Due Date</i> | <i>New Due Date</i> |
|------------------|---|--------------------------|------------------------------|
| Milestone 3b | <u>Deliverable(s) due September 30, 2022, as defined by the participating entity and approved in its BHQIP Implementation Plan.</u> | 09/30/2022 | 09/30/2022* *not extended |
| Milestone 3c | <u>DHCS-Required Deliverable:</u> Provide a signed attestation and other supporting documentation from the participating entity that certifies that the entity has begun the process of mapping data elements to the USCDI. | 09/30/2022 | 09/30/2022* *not extended |
| Milestone 3d | <u>DHCS-Required Deliverable:</u> Submit a performance improvement plan to improve performance on FUA, FUM, and POD during the measurement period of July 1, 2022 – June 30, 2023. Performance improvement plans should include how the participating entity will leverage improved data exchange capabilities to achieve improved performance. | 09/30/2022 | 09/30/2022* *not extended |

Reporting Templates Due September 30, 2022

Participating entities shall complete the three templates in the Enclosures and submit each Enclosure with its accompanying documentation as a single PDF. The three attachments shall be submitted via email to BHQIP@dhcs.ca.gov by the submission deadline.

- Enclosure 1: September 2022 Reporting Template
- Enclosure 2: Participating Entity Policies and Procedures Template – for Milestone 2e Deliverables due 9/30/22 as indicated above
- Enclosure 3: Performance Improvement Project Templates – for Milestone 3d Deliverables due 9/30/22

Guidance Clarifying DHCS' Expectations for Select Deliverables

Minimum Required Elements of a Training Plan

For applicable deliverables included in Milestones 2a, 2b, 2c, 2d, 2e, the minimum required elements of a training plan shall:

- Identify all staff that will use the new standards and require training;
- Ensure that identified staff attend the training sessions, including subcontracted providers;
- Include anticipated staff training completion dates; and
- Include training plan outline, including learning objectives, setting and before-after training evaluation materials.

Milestone 3a – Option 1

Milestone 3a Option 1 incentivizes participating entities to share data with Medi-Cal managed care plans (MCPs). The deliverable due September 30, 2022 is a copy of a signed data-sharing agreement between the participating entity and the MCP. Participating entities may submit versions redacting sensitive information.

DHCS offers the following clarification: Signing the California Health and Human Services Data Sharing Agreement (CalHHS DSA) is not required for this reporting period. Language from the CalHHS DSA may be used for the data-sharing agreement due to DHCS September 30, 2022. By the second BHQIP reporting deadline of March 1, 2023, participating entities electing Option 1 must sign the CalHHS DSA.

Further information on the CalHHS DSA can be found on this website:
[Data Exchange Framework - California Health and Human Services](#).

Milestone 3a – Option 2

For Milestone 3a, Option 2 requires participating entities to demonstrate onboarding to a Health Information Exchange (HIE).

DHCS offers the following clarification: The deliverable due September 30, 2022, is a copy of a signed Participation Agreement to onboard with an HIE that has signed the California Data Use and Reciprocal Support Agreement and joined the California

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Trusted Exchange Network. Participating entities may submit versions redacting sensitive information.

Questions regarding this BHIN may be directed to BHQIP@dhcs.ca.gov.

Sincerely,

Ivan Bhardwaj, Acting Chief
Medi-Cal Behavioral Health Division