



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



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DATE: February 17, 2023

Behavioral Health Information Notice No: 23-005
Supersedes [BHIN 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 March 2023, September 2023 and March 2024 deliverable submission deadlines and clarifies reporting requirements.

REFERENCE: Welfare & Institutions Code sections [14184.102\(d\)](#); [14184.405\(a\)](#); [BHIN 21-044](#); [BHIN 21-071](#); [BHIN 21-073](#); [BHIN 21-074](#); [BHIN 22-019](#); [BHIN 22-011](#); [BHIN 22-019](#); [BHIN 22-034](#); [BHIN 22-050](#); [BHIN 23-001](#).

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 of Health Care Services (DHCS); and (2) DHCS

¹ Welfare & Inst. Code § 14184.405(a)

has determined that the submitted documentation and deliverables are complete and compliant with applicable CalAIM requirements, and has approved the entity's submissions.

This BHIN clarifies and revises guidance for the deliverables due in the March 2023, September 2023, and March 2024 Reporting Periods, and extends the deadlines for select deliverables.

POLICY:

Template

Participating entities shall use the template provided via email by DHCS for all the deliverables due for the March 2023 Reporting Period. The template includes the deliverables that were extended from the September 2022 Reporting Period and are now included in the requirements for the March 2023 Reporting Period, as well as deliverables assigned for March 2023.

Deadline Extensions

The submission deadlines for the deliverables in **Table 1** below have been extended. These revised due dates supersede the due dates originally communicated in either the [CalAIM BHQIP Program Implementation Plan and Instructions](#), or [BHIN 22-050](#). Participating entities must submit these deliverables no later than the deadlines detailed in **Table 1**. All other March 2023 deliverables identified in previous guidance but not included in **Table 1** have the original deadline of March 1, 2023.

The impacts of these extensions on the March 2023, September 2023 and March 2024 Reporting Period incentive payments are detailed in **Table 3**.

Table 1: Revised Due Dates for Identified Deliverables

<i>Milestone</i>	<i>Deliverable</i>	<i>Original Due Date</i>	<i>New Due Date</i>
Milestone 1c	<u>DHCS-Required Deliverable:</u> Submit Policies & Procedures and/or BHP guidance for county fiscal staff to support new IGT protocol.	03/01/2023	05/01/2023
Milestone 3a – Option 1	<u>DHCS-Required Deliverable:</u> Signing the California Health and Human Services Data Exchange Framework (CalHHS	03/01/2023	09/30/2023

	DxF) Data Sharing Agreement (DSA).		
Milestone 3b	<u>DHCS-Required Deliverable:</u> Signed attestation form from the county that certifies the implementation of the FHIR API.	03/01/2023	09/30/2023
Milestone 3b	<u>DHCS-Required Deliverable:</u> Submit a log of successful FHIR transactions (deidentified) over a six month period in 2023.	09/30/2023	03/01/2024 ²
Milestone 3d	<u>DHCS-Required Deliverable:</u> Provide updated narratives on projects, challenges, lessons learned, and next steps related to quality improvement on these measures during the measurement period (DHCS to provide template).	03/01/2023	09/30/2023
Milestone 3d	<u>DHCS-Required Deliverable:</u> Provide updated narratives on projects, challenges, lessons learned, and next steps related to quality improvement on these measures during the measurement period (DHCS to provide template).	09/30/2023	03/01/2024

Deliverable Modifications

The requirements for the following deliverables are modified as outlined in **Table 2** below. The impacts of these modifications on the March 2023, September 2023 and March 2024 Reporting Period incentive payments are detailed in **Table 3**. If a

² Under previous guidance, the reporting period ending on March 1, 2024 would have been used as a “wrap up” period only. There were no deliverables assigned to this period, but counties would have been permitted to submit any outstanding deliverables from the September 30, 2023 reporting period. Because two March 1, 2023 deliverables for milestones 3b and 3d have been postponed to September 30, 2023, the deliverables for milestones 3b and 3d that were formerly due September 30, 2023 will now be due March 1, 2024. DHCS will not issue incentive payments for deliverables submitted after March 1, 2024.

deliverable is not listed in either Table 1 or Table 2, the requirements and reporting deadlines communicated in previous guidance ([BHIN 21-074](#) or [BHIN 22-050](#)) remain in effect as of the date of this Notice.

Table 2: Revised Requirements for Identified Deliverables

<i>Milestone</i>	<i>Deliverable</i>	<i>BHIN Action</i>	<i>Requirement</i>
Milestone 3c	Participating entity to determine deliverable.	Eliminated from BHQIP reporting requirements.	There is no requirement due March 1, 2023 for this milestone, nor will DHCS require submission of this entity-determined deliverable in a future reporting period.
Milestone 3d	<u>DHCS-Required Deliverable:</u> In collaboration with DHCS, report baseline performance rate (July 1, 2021 – June 30, 2022) for FUA, FUM and POD.	Eliminated from March 2023 BHQIP reporting requirements.	Not required to fulfill this specific Milestone 3d requirements for the BHQIP March 1, 2023 Reporting Period.
Milestone 3d	<u>DHCS-Required Deliverable:</u> Provide updated narratives on projects, challenges, lessons learned, and next steps related to quality improvement on these measures during the measurement period (DHCS to provide template).	Postponed but not eliminated from reporting requirements.	This deliverable will be required for the BHQIP September 30, 2023 Reporting Period. Entities will also be required to submit additional updates to the quality improvement plans by March 1, 2024 (as shown in table 1 above).

Incentive Payment Modifications

Table 3 depicts the impacts of the deliverable extensions and modifications detailed in **Table 1** and **Table 2** on incentive payments.

Table 3: Revised Incentive Payments Guidance for Identified Deliverables

<i>Milestone</i>	<i>Deliverable</i>	<i>BHIN Action</i>	<i>Impacts to 3/1/23 and 9/30/23 Incentive Payments</i>
Milestone 1c	<u>DHCS-Required Deliverable:</u> Submit Policies & Procedures and/or BHP guidance for county fiscal staff to support new IGT protocol.	Extended from 3/1/23 to 5/1/23	None. Entities are still eligible to receive the funds allocated for this deliverable during the March 1, 2023 Reporting Period in FY 2022-2023.
Milestone 3a – Option 1	<u>DHCS-Required Deliverable:</u> Signing the California Health and Human Services Data Exchange Framework (CalHHS Dx) Data Sharing Agreement (DSA).	Extended from 3/1/23 to 9/30/23	None. Entities are still eligible to receive incentive payment for Milestone 3a in this reporting period, based on completion of the other Milestone 3a – Option 1 deliverables (detailed on page 10 of this BHIN) that are due by March 1, 2023.
Milestone 3b	<u>DHCS-Required Deliverable:</u> Signed attestation form from the county that certifies the implementation of the FHIR API.	Extended from 3/1/23 to 9/30/23	Payments Postponed. Entities will not receive payments for this deliverable for the March 1, 2023 Reporting Period. Entities that are eligible to receive the funds allocated for this deliverable will receive funds following the September 30, 2023 Reporting Period.
Milestone 3b	<u>DHCS-Required Deliverable:</u> Submit a log of successful FHIR transactions	Extended from 9/30/23 to 3/1/24	Payments Postponed. Entities will not receive payments for this deliverable for the September 30, 2023

	(deidentified) over a six month period in 2023.		Reporting Period. Instead, entities will be eligible to receive the funds allocated for this deliverable following the March 1, 2024 Reporting Period in FY 2023-2024.
Milestone 3c	Participating entity to determine deliverable.	Eliminated from March 1, 2023 reporting requirements	Payments Redistributed. No payments will be distributed for this eliminated deliverable. Instead, these funds will be redistributed across all other March 2023 deliverables completed by counties by the March 1, 2023 reporting deadline.
Milestone 3d	<u>DHCS-Required Deliverable:</u> Provide updated narratives on projects, challenges, lessons learned, and next steps related to quality improvement on these measures during the measurement period (DHCS to provide template).	Extended from 3/1/23 to 9/30/23	Payments Postponed. Entities will not receive payments for this deliverable for the March 1, 2023 Reporting Period. Entities that are eligible to receive the funds allocated for this deliverable will receive funds following the September 30, 2023 Reporting Period. Partial incentive payments will be allowed for this deliverable at the discretion of DHCS.
Milestone 3d	<u>DHCS-Required Deliverable:</u> Provide updated narratives on projects, challenges, lessons learned, and next steps related to quality improvement on these measures during the measurement period	Extended from 9/30/23 to 3/1/24	Payments Postponed. Entities will not receive payments for this deliverable for the September 30, 2023 Reporting Period. Instead, entities will be eligible to receive the funds allocated for this deliverable following the March 1, 2024 Reporting Period in FY 2023-2024.

	(DHCS to provide template).		Partial incentive payments will be allowed for this deliverable at the discretion of DHCS.
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Guidance Clarifying DHCS’ Expectations for Select Deliverables

Minimum Required Elements of a Training Plan

Deliverables included in Milestones 1a, 2a, 2b, 2c and 2e require documentation of a training plan. [BHIN 22-050](#) specifies that documentation of a training plan must include specified elements. That requirement, which is reproduced below, applies to deliverables due for the subsequent March 2023, September 2023 and March 2024 Reporting Periods.

For applicable deliverables, 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 1b

Milestone 1b requires participating entities to update county claiming systems and successfully submit 837 transitions to the Short-Doyle Medi-Cal (SD/MC) claiming system for county-operated and subcontracted specialty mental health services and DMC-SP/DMC-ODS services. The deliverable due March 1, 2023 is: Document or attest to analysis of new rates progress on rate/contract negotiations with providers.

DHCS offers the following clarification: This deliverable shall include the following information:

- Detailed description of actions the county has taken to model and project Medi-Cal reimbursement post payment reform;
- Description of how the county intends to apply this analysis to develop network provider rates, as applicable; and
- Description of the current status of FY 2023-24 rate negotiations with network providers.

Please see the detailed prompts provided in the reporting template. County submissions for this deliverable must include all information requested in the template to be considered complete and eligible for an incentive payment.

Milestones 2a, 2b and 2c

Milestones 2a and 2b require submission of records documenting the percentage of relevant staff who received training on use of the standardized screening and transition tools. Milestone 2c requires submission of records documenting the percentage of providers trained on use of ASAM criteria.

DHCS offers the following clarification: The county may submit attestations from subcontractors as evidence of training participation, if applicable.

Milestone 2b

Milestone 2b is to implement standardized transition tool in compliance with DHCS guidance. The deliverable due March 1, 2023 is: Submit initial reports showing tracking of referrals to and from Medi-Cal managed care plans (MCPs), using the transition tool, showing closed-loop referrals.

DHCS offers the following clarification: Participating entities must submit initial reports showing tracking of referrals to and from MCPs, using the transition tool, showing closed-loop referrals, if referrals have been made. If no referrals have been made, please indicate, “no referrals made” or use similar language.

Milestone 2c

Milestone 2c is to implement ASAM criteria to determine level of care in compliance with DHCS guidance. The deliverable due March 1, 2023 is: Submit records documenting percentage of providers trained on use of the ASAM criteria. Include information about how the county partnered with its subcontractors to support and monitor timely participation in trainings.

DHCS offers the following clarification: This deliverable shall include the following information:

- A list of the support and monitoring activities that the county provided, including the frequency of these activities, and the percentage of providers trained.
- The county may submit attestations from subcontractors as evidence of training participation, if applicable.

Milestone 2d

Milestone 2d incentivizes participating entities to implement revised documentation standards, including but not limited to, assessment domains, problem lists, progress notes, and applicable timeliness standards. The following deliverables due March 1, 2023 are:

- Updated utilization management policies
- Updated audit, oversight and recoupment policies, procedures and protocols to comply with new specialty mental health services criteria, assessment domains, documentation standards and other CalAIM behavioral health policies, aligned with new DHCS auditing and recoupment standards.
- Documentation of communication/ training with providers

DHCS offers the following clarification: [BHIN 22-019](#) sets forth the revised assessment domains and documentation standards. [BHIN 21-071](#), [BHIN 21-073](#) and [BHIN 23-001](#) specify the new beneficiary access and medical necessity requirements.

Milestone 2e

Milestone 2e incentivizes participating entities to provide guidance and training to county-operated and county-contracted providers on all new behavioral health policies, as outlined by DHCS in Behavioral Health Information Notices. The deliverables due March 1, 2023 include the following: Submit updated policies and procedures reflecting CalAIM behavioral health policy changes for mandatory screening and transition tools for specialty and non-specialty mental health.

DHCS offers the following clarification: Participating entities shall also revise and resubmit as part of this deliverable due March 1, 2023, any policies and procedures DHCS deemed to be incomplete from the following Reporting Periods:

- September 2022
- April 2022

As part of the Milestone 2e deliverable due September 30, 2023, participating entities shall also revise and resubmit any policies and procedures DHCS deemed to be incomplete from the following Reporting Periods:

- March 2023
- September 2022
- April 2022

Milestone 3a – Option 1

Milestone 3a Option 1 incentivizes participating entities to share data directly with MCPs. The deliverables due March 1, 2023 include the following: a copy of a data-sharing transaction log or a de-identified Health Level 7 (HL7) message (or other equivalent documentation) to and from the MCPs and participating entity.

DHCS amends previous guidance as follows: Participating entities shall submit the following deliverables in lieu of the Milestone 3a – Option 1 deliverable detailed in the [Implementation Plan and Instructions](#):

- A signed attestation of ongoing data transfer between the participating entity and Managed Care Organization(s). Information exchange should occur through a secure means agreed upon by the participating entity and the Managed Care Organization(s). DHCS will provide an attestation form that will require the physical or certified digital signature of the Managed Care Organization representative and the physical signature or certified digital signature of an approved representative for the participating entity.
- A description of the types, frequencies, and methods of data exchange of in production transactions to and from the Managed Care Organization and the participating entity using real patient information.
- A summary of the lessons learned from completing this requirement.

DHCS offers the following clarification: As part of the Milestone 3a – Option 1 deliverables, participating entities will be required to sign the California Health and Human Services Data Exchange Framework (CalHHS DxF) Data Sharing Agreement (DSA). This deliverable has been postponed and is not due March 1, 2023, but will be required for the September 30, 2023, reporting period, as shown in the tables above.

Milestone 3a – Option 2

Milestone 3a Option 2 incentivizes participating entities to onboard to a Health Information Exchange (HIE). The deliverables due March 1, 2023, include the following: a copy of a transaction log or a de-identified HL7 message (or other equivalent documentation) to and from the HIE and county.

DHCS amends previous guidance as follows: Participating entities shall submit the following deliverables in lieu of the Milestone 3a – Option 2 deliverable detailed in the [Implementation Plan and Instructions](#):

- A signed attestation that the reporting entity has begun to utilize the California Trusted Exchange Network Participant Health Information Organization to send and receive data. Information exchange should occur through the HIE through systems consistent with HL7 v2 messaging or C-CDA R2 data content standards and exchanged through a secure means. DHCS will provide an attestation form

that will require the physical signature or certified digital signature of an approved representative for the participating entity.

- A log or record demonstrating ongoing data exchange of the reporting entity through the HIE.
 - This document may be provided by reporting entity or the HIE. It should not contain any protected health information. Manual expungement of protected health information may be required.
- A description of the type, frequencies, and methods of data exchanged by the reporting entity through the HIE.
- A summary of the lessons learned from completing this requirement.

Milestone 3d

Milestone 3d incentivizes participating entities to leverage improved data exchange capabilities to improve quality and coordination of care. The deliverables that were postponed for March 1, 2023, and are now due September 30, 2023 and March 1, 2024 include the following: provide updated narratives on projects, challenges, lessons learned, and next steps related to quality improvement on these measures during the measurement period (DHCS to provide template).

DHCS offers the following clarification: For the September 2023 and March 2024 Milestone 3d deliverables:

“These measures” (as described on page 30 of the [BHQIP Program Implementation Plan](#)) shall include:

- Follow-Up After Emergency Department Visit for Alcohol and Other Drug Abuse or Dependence (FUA);
- Follow-Up After Emergency Department Visit for Mental Illness (FUM); and
- Pharmacotherapy for Opioid Use Disorder (POD).

The “measurement period” for these Milestone 3d measures refers to the National Committee for Quality Assurance’s (NCQA) Healthcare Effectiveness Data and Information Set (HEDIS) Measurement Year 2022 specifications. Participating entities may visit the [NCQA HEDIS Measures and Technical Resources](#) for more information. Questions regarding this BHIN may be directed to BHQIP@dhcs.ca.gov.

Sincerely,

Original signed by

Michele Wong, Chief
Medi-Cal Behavioral Health–Oversight and Monitoring Division