



JENNIFER KENT  
DIRECTOR

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



EDMUND G. BROWN JR.  
GOVERNOR

DATE: September 14, 2016

MHSUDS INFORMATION NOTICE NO.: 16-044

TO: COUNTY BEHAVIORAL HEALTH DIRECTORS  
COUNTY DRUG & ALCOHOL ADMINISTRATORS  
COUNTY BEHAVIORAL HEALTH DIRECTORS ASSOCIATION OF CALIFORNIA  
CALIFORNIA COUNCIL OF COMMUNITY BEHAVIORAL HEALTH AGENCIES  
COALITION OF ALCOHOL AND DRUG ASSOCIATIONS CALIFORNIA  
ASSOCIATION OF ALCOHOL & DRUG PROGRAM EXECUTIVES, INC.  
CALIFORNIA ALLIANCE OF CHILD AND FAMILY SERVICES

SUBJECT: CLARIFYING THE MEANING OF “FACE-TO-FACE REVIEW” FROM THE STANDARD TERMS OF CONDITIONS FOR THE DRUG MEDI-CAL ORGANIZED DELIVERY SYSTEM

### PURPOSE

This notice is to provide clarification to the meaning of the term “face-to-face review” on the standard terms and conditions (STC) of the Drug Medi-Cal Organized Delivery System (DMC-ODS) 1115 demonstration waiver.

### BACKGROUND

Current practice in Drug Medi-Cal for determining medical necessity requires that a physician signs off on the assessment and plan. There is no requirement for any “face-to-face” interaction as part of this process. The DMC-ODS STC includes a new requirement for a “face-to-face review” to make the determination of medical necessity found in section 128 (e)(ii). The STC also includes the addition of a Licensed Practitioner of the Healing Arts (LPHA) as another appropriate provider qualification for making the determination of medical necessity. Additionally, the STC allows the “face-to-face review” to occur through the use of telehealth.

## DISCUSSION

There have been various discussions with the Department related to the requirement for a “face-to-face review” to determine the medical necessity for a beneficiary who is receiving services through the DMC-ODS. As a result, the Department is providing this information notice to establish clear guidance.

For clarity, counties must establish a process where there is a “face-to-face” interaction at the time the Medical Director, licensed physician, or LPHA are validating or verifying the determination of medical necessity. This “face-to-face” interaction must take place, at minimum, between the certified counselor who has completed the assessment for the beneficiary and the Medical Director, licensed physician, or LPHA. It would be allowable to include the beneficiary in this “face-to-face” interaction. This interaction also must be documented appropriately in the medical record to establish the determination of medical necessity for the beneficiary.

## QUESTIONS/MAINTENANCE

Questions regarding this Information Notice should be addressed to Marco Zolow, Health Program Specialist, SUD Program, Policy, and Fiscal Division at (916) 327-2730

Sincerely,

Original signed by

Karen Baylor, Ph.D., LMFT, Deputy Director  
Mental Health & Substance Use Disorder Services