

Behavioral Health Quality Improvement Program: CalAIM

Program Implementation Plan and Instructions for County Behavioral Health Plans

Due: 60 days from the CalAIM BHQIP Behavioral Health Information Notice publication date

Table of Contents

Executive Summary	3
General Instructions	5
Evaluation	6
Reporting on Deliverables	6
Funding Allocation Schedule	6
BH Plan Prop 30 Reimbursement	10
Section 1: Participating BHP Information	11
Section 2:	12
Goal 1: Payment Reform	12
Section 3:	16
Goal 2: Implementation of CalAIM Behavioral Health Policy Changes	16
Section 4:	20
Goal 3: Data Exchange	20
Section 5: Technical Assistance and Training	31
Section 6: Certification	32

Executive Summary

The California Advancing and Innovating Medi-Cal (CalAIM) Behavioral Health Quality Improvement Program (BHQIP) is an incentive payment program to support Mental Health Plans (MHP), Drug Medi-Cal State Plans (DMC) and Drug Medi-Cal Organized Delivery Systems (DMC-ODS), hereafter referred to as participating entities, as they prepare for changes in the CalAIM initiative and other approved administration priorities.¹ The guidance in this document applies to CalAIM, focused on implementation of payment reform,² behavioral health policy changes,³ and bi-directional data exchange between systems of care for the purpose of improving quality and behavioral health outcomes and care coordination for Medi-Cal beneficiaries.⁴ Each participating entity earn incentive payments in the CalAIM BHQIP by achieving certain milestones as outlined below. The CalAIM BHQIP incentives are available beginning July 1, 2021 through December 31, 2023. For Fiscal Year (FY) 2021-22, Senate Bill (SB) 129 (Chapter 69; Statutes of 2021), authorized \$21,750,000 in General Fund dollars for the CalAIM BHQIP, with \$86 million authorized over the course of program

Goal 1. Payment Reform

Milestones:

- a. Implement new Current Procedural Technology/ Healthcare Common Procedure Coding System (CPT/HCPCS) procedure codes, modifiers, place of service codes, and taxonomy codes.
- b. Update county claiming systems to successfully submit 837 transactions to the Short-Doyle Medi-Cal (SD/MC) claiming system.
- c. Implement new Intergovernmental Transfer (IGT) agreement protocol

Goal 2. Implementation of CalAIM Behavioral Health Policy Changes Milestones:

- a. Implement standardized screening tools in compliance with DHCS guidance.
- b. Implement standardized transition of care tools in compliance with DHCS guidance.
- c. <u>For DMC Only:</u> Assist providers to implement ASAM Criteria to determine level of care in compliance with DHCS Guidance.
- d. Implement revised documentation standards, includingbut not limited to, assessment domains, problem lists, progress notes, and applicable timeliness standards.
- e. 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:
 - Criteria for DMC and DMC-ODS services, including use of ASAM

¹ Welf. & Inst. Code § 14184.405(a)

² Welf. & Inst. Code § 14184.403

³ See Welf. & Inst. Code § 14184.402

⁴ Welf. & Inst. Code § 14184.405(a)

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.

- Criteria to access Specialty Mental Health Services (SMHS) for adults and for children (including criteria related to trauma, child welfare involvement, and homelessness)
- Mandatory screening and transition tools for specialty and nonspecialty mental health
- Documentation requirements and assessment standards (SMHS and DMC, DMC-ODS)
- No wrong door (SMHS)
- Co-occurring diagnoses (SMHS and DMC, DMC-ODS)
- Treatment during assessment period, prior to diagnosis (SMHS and DMC, DMC-ODS)

Goal 3. Data Exchange

The purpose of this goal is to promote bi-directional data exchange between MHP, DMC, DMC-ODS and Managed Care Plans (MCPs) in order to improve health outcomes and health equity through enhanced coordination of care.

Such data exchange and care coordination is paramount to:

- Meeting CMS-mandated interoperability standards.
- Supporting implementation of MCP Enhanced Care Management (ECM)/Community Supports programs in CalAIM.
- Improving performance on Core Set measures such as <u>Follow-up After Emergency</u> <u>Department Visit for Mental Illness (FUM)</u>, <u>Follow-up After Emergency Department</u> <u>Visit for Alcohol and Other Drug Abuse or Dependence (FUA) and</u> <u>Pharmacotherapy for Opioid Use Disorder (POD)</u>

Milestones:

- a. Demonstrate improved data exchange capabilities.
 - Option 1: Demonstrate direct sharing of data with MCPs
 - Option 2: Demonstrate onboarding to a Health Information Exchange (HIE)
- b. Demonstrate an active Fast Healthcare Interoperability Resources (FHIR) application programming interface (API) that will allow the MHP, DMC, and DMC-ODS to be compliant with CMS-mandated interoperability rules.
- c. Demonstrate that the MHP, DMC, and DMC-ODS have mapped data elements to the United States Core Data for Interoperability (USCDI) standard set.
- d. Leverage improved data exchange capabilities to improve quality and coordination of care.

General Instructions

Thank you for your participation in the CalAIM BHQIP. The county Implementation Plan (IP) is designed to show how your entity will implement CalAIM BHQIP goals. You may submit one plan to cover both specialty mental health and substance use disorder treatment (DMC or DMC-ODS). Alternatively, you may submit one IP for the MHP and one IP for the DMC or r DMC-ODS, and the relative allocations for these separate plans will be determined as directed by you. In the IP and/or claim form, a participating entity may request a single check, or may request a specific distribution of funds (e.g., 50% of funds allocated to the MHP and 50% to DMC-ODS).

The CalAIM BHQIP IP is divided into three sections, one for each goal. Within each section, a participating entity must describe how it will operationalize all program milestones for each goal. The IP must have key deliverables and action steps that will be completed by June 30, 2023 and reported in the September 2023 reporting period.

Terminology

<u>Milestones:</u> Specific outcomes or achievements related to the Goal. DHCS will define one or more milestones for each Goal that every participating entity is intended to reach by July 2023.

<u>Deliverables:</u> Products or documentation provided as evidence of tangible progress towards milestones. DHCS has mandated some deliverables (labeled "**Required**"); others may be proposed by each participating entity, subject to DHCS approval.

<u>Action Steps:</u> Description of the local activities that each participating entity will take to achieve deliverables. Each participating entity will define their own action steps.

The IP is due to DHCS no later than 60 days from the publication date of this BHIN. Please refer to Enclosure 1 of Behavioral Health Information Notice (BHIN) No. 21-074 regarding CaIAIM BHQIP incentive funds available and the total annual allocation. Detailed reporting templates will be issued by DHCS in early 2022.

Funding

- Each participating entity may opt to jointly implement program requirements and pool their funding.
- Funds may be used at each participating entity's discretion to accomplish CalAIM requirements including (but not limited to) staffing, technology and infrastructure, contracting, training and/or technical assistance. However, funds disbursed through CalAIM BHQIP may not be redirected to a purpose unrelated to CalAIM goals.
- As described in this guide, DHCS will not disburse incentive payments for milestones that are not met. Withheld incentive funds will be pooled and reallocated to other participating entities.

Evaluation

Each IP will be evaluated and approved on a "Pass/No Pass" basis. DHCS will evaluate the responses to each section and determine if the response demonstrates that the program participant will be able to meet program goals through the activities described in the IP. In the event that a response to an IP section fails to meet criteria, the applicant will have an opportunity to revise the response(s) per DHCS's feedback and/or requested revisions. Applicants will have two weeks to complete the revisions upon receiving initial feedback from DHCS, and the payment date will be delayed accordingly. Extensions may be requested and will be considered on a case-by-case basis.

Please complete all sections of the IP and return to <u>BHQIP@dhcs.ca.gov</u>.

Reporting on Deliverables

In order to earn incentives, each participating entity is required to report achievement of milestones and to submit associated deliverables. DHCS will release reporting templates with specifications in a future Information Notice in early 2022.

Reporting deadlines are September 30 and March 1 of each year. Deliverables and milestones may be completed prior to each reporting period, and will then be reported in the September 30 or March 1 report. All reports must be submitted to <u>BHQIP@dhcs.ca.gov</u>.

Funding Allocation Schedule

The allocation schedule (Enclosure 1) involves the following two steps:

- Each participating entity is eligible for an initial allocation of program startup funds in the amount of \$250,000. (Please refer to <u>BHIN 21-044</u> for information regarding the startup funds claiming process). Startup funds will be available until January 31, 2022. BHQIP claiming forms were due to DHCS by October 1, 2021. If a participating entity does not submit the claiming form by January 31, 2022, DHCS will not issue any startup funds to that entity, and the funds will be added to the BHQIP pool for distribution in FY 2021-22.
- For the remaining funds, each participating entity allocation is based on its share of statewide claims value reported to DHCS for Fiscal Year 2019-20 for SMHS, DMC-ODS and DMC. The methodology includes an equity adjustment for small counties, to ensure that each participating entity, regardless of its claims value is eligible to receive a minimum of \$100,000 per year of the program.

The statewide BHQIP funds for each budget year are as follows:

FY 2021-22	\$ 21,750,000	25%
FY 2022-23	\$ 45,396,400	52%
FY 2023-24	\$ 19,455,600	23%
TOTAL	\$ 86,602,000	100%

Incentive payment distributions:

- 1. Start-up costs are distributed based on a participating entity's signing the CalAIM BHQIP start-up funds claim form.
- 2. Incentive payments are based on the participating entity meeting all milestones listed in its IP.
- Deliverables are generally contingent upon DHCS issuing timely policy guidance to counties. If DHCS is delayed in issuing necessary policy guidance, deadlines for BHQIP deliverables will be subject to revision and re-negotiation, with input from CBHDA on behalf of participating entities.
- 4. DHCS may require each participating entity to respond to clarifying questions, whose responses must be turned in within two weeks of DHCS's request.
- 5. Each participating entity may request modifications to self-defined deliverables for future reporting periods by submitting requests to DHCS at least five months prior to the start of the reporting period in question. For example, concurrent with its September 2022 report, a county may submit requests for modification to self-defined deliverables scheduled for March 2023 or September 2023. Required deliverables will not be modified unless DHCS issues further guidance.

Incentive payment funds will be made available as follows:

- a. For the September 30, 2022 and September 29, 2023 reports:
 - 100% of the incentive funds allocated for this period will be available if all deliverables for this period in the IP are submitted on time and approved by DHCS. If DHCS determines, in its sole discretion, that all deliverables are not approved, a participating entity will receive a percentage of funds commensurate with the percentage of total deliverables that are approved.
 - Participants can submit the September report by the due date regardless of missing deliverables, however, DHCS payment will be commensurate with the proportion of the deliverables that have been submitted and approved.
 - If the September report is not submitted by the deadline, the available incentive payment allocation is as follows:
 - 95% of the incentive funds allocated are available if all deliverables are completed and reported to DHCS within 3 months of the original due date (October through December).
 - 90% of incentive funds allocated are available if all September deliverables are completed and approved by the end of February. DHCS will not accept any September deliverables received after February.
 - March deliverables submitted with September reports in the same fiscal year are payable early.

- b. For the March reporting periods:
 - 100% of the incentive funds allocated per participating entity for this period will be available if all deliverables for this period in the IP are submitted and approved.
 - Funds do not carry over into the subsequent fiscal year, so incentive payments for a particular fiscal year are forfeited for any deliverables that are submitted after March 1st of each fiscal year (since DHCS requires 90 days to process report and issue payment).
- c. Final Disbursement
 - The final disbursement for the fiscal year will include the approved September wrap up deliverables from January through February (as applicable) as well as the percent of total March deliverables submitted and approved, as determined by the DHCS in its sole discretion. Funds not distributed will be re-allocated to counties that achieved all deliverables on time, using a methodology developed in consultation with CBHDA.

6. Please see the following table that expands upon funds available by reporting period:

Table 1. Percentage of Incentive Funds available per report submission timeline

	September Reports	September deliverables wrap up (October through December)	September deliverables wrap up (January through February)	March Reports
Deliverable Submission	Available Funds Per Approved Deliverable	Available Funds Per Approved Deliverable	Available Funds Per Approved Deliverable	Available Funds Per Approved Deliverable
Timely, Complete	100%	N/A	N/A	100%
Timely, Incomplete or Inaccurate	(Total Incentive/# of Deliverables)* # on-time deliverables	(Total Incentive/# of Deliverables)* # on-time deliverables Funds Disbursed in 90 days	(Total Incentive/# of Deliverables)*# on time deliverables Funds Held until Final Disbursement	(Total Incentive/# of Deliverables)* # on-time deliverables
Untimely, Complete	N/A	95% Funds Disbursed in 90 days	90% Funds Held until Final Disbursement	N/A
Untimely, Incomplete	N/A	95% of (Total Incentive/# of Deliverables)*# deliverables Funds Disbursed in 90 days	90% of (Total Incentive/# of Deliverables)*# deliverables Funds Held until Final Disbursement	N/A

Funds Availability Schedule

FY 2021-22: Preparation Year

• Start-up Funds (\$250,000 per county: \$14,250,000)

State of California – Health and Human Services Agency

- Implementation Plan due date is 60 days from date of BHIN publication (based on allocation schedule: \$7,500,000 total)
- Total \$21,750,000

FY 2022-23 – Incentive payments based on milestones and deliverables

- Incentive payment 1 \$34,047,300
 - Reports due 9/30/22
- Incentive payment 2 \$11,349,100 (up to 100% of incentive payment 2 can be disbursed in incentive payment 1 if all deliverables due in the 3/1/23 report are achieved and reported in the 9/30/22 report). The amount disbursed will be commensurate with the percent of deliverables accomplished early.
 - Reports due 3/1/23

Total - \$45,396,400

FY 2023-24 – Incentive payments based on milestones and deliverables

- Final incentive payment \$19,455,600
 - Reports due 9/30/23
- Opportunity for adding an update to the final report:
 - DHCS will distribute any unearned incentives to counties that have achieved all milestones and deliverables in an updated final report by 3/1/24.
 - Any unearned incentives will be distributed to counties achieving all milestones and deliverables on time.

Total - \$19,455,600

Prop 30 Reimbursement

DHCS is committed to meeting its Proposition 30 responsibilities and acknowledges that CalAIM BHQIP payments outlined in this document may not fully meet the costs incurred for implementing these initiatives. DHCS will issue further guidance at a later date related to claiming for these additional costs.

Section 1: Participating Entity Information

Name	

PRIMARY CONTACT

Name	
Title, Department or	
Telephone number	
Email Address	
Mailing Address	

BACKUP CONTACT

Name	
Title, Department or	
Telephone number	
Email Address	
Mailing Address	

Section 2: Goal 1: Payment Reform

Instructions

Please provide key deliverables and the action steps necessary to achieve each deliverable using the tables below.

Deliverables: DHCS includes deliverables as examples; a participating entity may replace these with their own deliverables, or add new deliverables, as long as they lead to meeting the goal by the deadline. Deliverables labeled **required** are required for all participating entities.

Action Steps: These are to be defined by the participating entity – what tasks need to be completed to meet the deadline for the deliverable?

Milestone 1a:

Implement new CPT/HCPCS procedure codes, modifiers, place of service codes, and taxonomy codes.

Due Date	Required Deliverables (as developed by DHCS)	Deliverables Developed by Entity	Action Steps
9/30/22	Participating entity to provide own deliverable Example: Contract amendments completed with vendor(s); implementation plan complete.		
3/1/23	Required: Submit boilerplate contracts for subcontracted providers that reflect the new code set and claiming requirements		

	<u> </u>	
	Required:	
	Submit CPT code	
	training plan,	
	including	
	information on	
	availability of	
	training for	
	subcontracted	
	providers and	
	county staff.	
9/29/23	Required –	
	Minimum	
	submissions:	
	1. At least 10	
	claims that	
	pass the	
	Strategic	
	National	
	Implementa	
	tion	
	Process	
	(SNIP) edit.	
	2. At least 10	
	DMC	
	claims that	
	are	
	approved.	
	(including	
	DMC-ODS	
	or DMC	
	claims). 3. At least 10	
	SMHS	
	claims that	
	are	
	approved.	

Milestone 1b:

Update county claiming systems and successfully submit 837 transactions to the Short-Doyle Medi-Cal (SD/MC) claiming system for county-operated and subcontracted SMHS and DMC-SP/DMC-ODS services.

Due	Required	Deliverables Developed by	Action Steps
Date	Deliverables	Entity	

DHCS 8761 (12/2021)

 to provide own deliverable Example: Assess changes needed to claiming system and incorporate in I.T. contract 3/1/23 Required: Document or attest to analysis of new rates and progress on rate/contract negotiations with providers. 9/29/23 Required: Submit documentation that all new claiming rates have been loaded into county systems Required: Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024- 		(as developed by DHCS)
 Example: Assess changes needed to claiming system and incorporate in I.T. contract 3/1/23 Required: Document or attest to analysis of new rates and progress on rate/contract negotiations with providers. 9/29/23 Required: Submit documentation that all new claiming rates have been loaded into county systems Required: Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024- 	9/30/22	Participating entity to provide own
Assess changes needed to claiming system and incorporate in <i>I.T. contract</i> 3/1/23 Required: Document or attest to analysis of new rates and progress on rate/contract negotiations with providers. 9/29/23 Required: Submit documentation that all new claiming rates have been loaded into county systems Required: Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024-		
 claiming system and incorporate in <i>I.T. contract</i> 3/1/23 Required: Document or attest to analysis of new rates and progress on rate/contract negotiations with providers. 9/29/23 Required: Submit documentation that all new claiming rates have been loaded into county systems Required: Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024- 		Assess changes
and incorporate in <i>I.T. contract</i> 3/1/23 Required: Document or attest to analysis of new rates and progress on rate/contract negotiations with providers. 9/29/23 Required: Submit documentation that all new claiming rates have been loaded into county systems Required: Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024-		
I.T. contract3/1/23Required: Document or attest to analysis of new rates and progress on rate/contract negotiations with providers.9/29/23Required: Submit documentation that all new claiming rates have been loaded into county systemsRequired: Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024-		
Document or attest to analysis of new rates and progress on rate/contract negotiations with providers.9/29/23Required: Submit documentation that all new claiming rates have been loaded into county systemsRequired: Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024-	- / - /	I.T. contract
attest to analysis of new rates and progress on rate/contract negotiations with providers. 9/29/23 Required: Submit documentation that all new claiming rates have been loaded into county systems Required : Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024-	3/1/23	
progress on rate/contract negotiations with providers. 9/29/23 Required: Submit documentation that all new claiming rates have been loaded into county systems Required : Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024-		attest to analysis
rate/contract negotiations with providers. 9/29/23 Required: Submit documentation that all new claiming rates have been loaded into county systems Required: Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024-		
9/29/23 Required: Submit documentation that all new claiming rates have been loaded into county systems Required: Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024-		
9/29/23 Required: Submit documentation that all new claiming rates have been loaded into county systems Required: Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024-		
Submit documentation that all new claiming rates have been loaded into county systems Required : Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024-	9/29/23	
that all new claiming rates have been loaded into county systems Required : Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024-	0, _0, _0	Submit
claiming rates have been loaded into county systems Required : Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024-		
have been loaded into county systems Required : Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024-		
systems Required: Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024-		have been loaded
Required: Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024-		-
Submit contract execution schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024-		
schedules for all network providers requiring contract updates which may occur on a rolling basis through FY 2024-		Submit contract
network providers requiring contract updates which may occur on a rolling basis through FY 2024-		
updates which may occur on a rolling basis through FY 2024-		network providers
may occur on a rolling basis through FY 2024-		
rolling basis through FY 2024-		
		rolling basis
25		through FY 2024- 25.

<u>Milestone 1c</u>: Implement new Intergovernmental Transfer (IGT) agreement protocol

Due Date	Required Deliverables (as developed by DHCS)	Deliverables Developed by Entity	Action Steps
9/30/22	Participating entity to provide own deliverable		
	Required: Submit Policies & Procedures and/or BHP guidance for county fiscal staff to support new IGT protocol.		
	Required: Submit documentation that all IGT agreement protocols have been implemented.		

Section 3:

Goal 2: Implementation of CalAIM Behavioral Health Policy Changes

Instructions

Please provide key deliverables and the action steps necessary to achieve each deliverable using the tables below.

Deliverables: DHCS includes deliverables as examples; a participating entity may replace these with their own deliverables, or add new deliverables, as long as they lead to meeting the goal by the deadline. Deliverables labeled **required** are required for all participating entities.

Action Steps: These are to be defined by the participating entity – what tasks need to be completed to meet the deadline for the deliverable?

Milestone 2a:

Implement standardized screening tool in compliance with DHCS guidance.

Due Date	Required Deliverables (as developed by DHCS)	Deliverables Developed by Entity	Action Steps
9/30/22	Required: Document training plan for all relevant MHP, DMC, or DMC-ODS staff (e.g., access line and MHP intake staff) on screening tool		
	Required: Submit records documenting percentage of relevant staff trained on use of the standardized screening tool. Required:		

Submit policies and procedures that describe use of standardized screening tools.	
9/30/23 Required: Submit reports showing outcome of screening tool (e.g., percentage of callers referred to the MHP, DMC- SP, DMC-ODS vs MCP)	

Milestone 2b:

Implement standardized transition tool in compliance with DHCS guidance.

Due Date	<u>Required</u> Deliverables (as developed by DHCS)	Deliverables Developed by Entity	Action Steps
9/30/22	Required: Document training plan for all relevant MHP, DMC or DMC-ODS staff and subcontracted providers		
3/1/23	Required: Submit records documenting percentage of relevant staff and providers trained on use of the standardized transition tool. Attestations from subcontractors will suffice as evidence		

of training participation. Required: Submit initial reports showing tracking of referrals to and from MCPs, using the transition tool, showing closed-loop referrals.	
9/30/23 <u>Required</u> : Submit reports showing tracking of referrals to and from MCPs, using the transition tool, showing closed- loop referrals.	

Milestone 2c:

For DMC Only: Implement ASAM criteria to determine level of care in compliance with DHCS guidance.

Due Date	<u>Required</u> Deliverables (as developed by DHCS)	Deliverables Developed by Entity	Action Steps
9/30/22	Required: Document training plan for all relevant DMC staff and subcontracted providers		
3/1/23	Required: Submit records documenting percentage of providers trained on use of the ASAM criteria. Include information		

DHCS 8761 (12/2021)

	about how the	
	county partnered	
	with its	
	subcontractors to	
	support and	
	monitor timely	
	participation in	
	trainings.	
	Required:	
	Submit initial	
	reports showing tracking use of	
	ASAM criteria to	
	determine	
	appropriate level of	
	care (example	
	using scores from	
	the UCLA ASAM	
	Assessment Tool	
	to determine	
	placement).	
9/30/23	Required:	
	Submit updated	
	reports showing	
	tracking use of	
	ASAM criteria to	
	determine	
	appropriate level of	
	care (example	
	using scores from	
	the UCLA ASAM	
	Assessment Tool	
	to determine	
	placement).	

Milestone 2d:

Implement revised documentation standards, including but not limited to, assessment domains, problem lists, progress notes, and applicable timeliness standards

Due	<u>Required</u>	Deliverables Developed by	Action Steps
Date	Deliverables	Entity	
	l (as		

	developed by DHCS)	
9/30/22	Required:	
	Submit evidence of	
	EHR changes that	
	support	
	documentation	
	reform, such as	
	vendor contracts.	
	Required:	
	Submit updated	
	excerpts from	
	documentation	
	manuals, list of	
	updated county	
	Policies and	
	Procedures, or	
	similar evidence	
	that counties 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).	
	Required:	
	Document training	
	plan inclusive of	
	the new CalAIM	
	policies listed	
	above, and	
	participation of	
	MHP, DMC or	
	DMC-ODS staff	

DHCS 8761 (12/2021)

	and providers in	
	training:	
	 Include 	
	information	
	on training	
	made	
	available to	
	subcontract	
	ed providers	
	and	
	describe	
	how the	
	county has	
	supported	
	and	
	monitored	
	timely	
	participation	
	in trainings	
	for its	
	subcontract	
	ors.	
0/1/00		
3/1/23	Required:	
	Updated	
	utilization	
	management	
	management policies	
	policies	
	policiesUpdated audit,	
	policiesUpdated audit, oversight and	
	 policies Updated audit, oversight and recoupment 	
	 policies Updated audit, oversight and recoupment policies, 	
	 policies Updated audit, oversight and recoupment policies, procedures and 	
	 policies Updated audit, oversight and recoupment policies, procedures and protocols to 	
	 policies Updated audit, oversight and recoupment policies, procedures and protocols to comply with 	
	 policies Updated audit, oversight and recoupment policies, procedures and protocols to comply with new specialty 	
	 policies Updated audit, oversight and recoupment policies, procedures and protocols to comply with new specialty mental health 	
	 policies Updated audit, oversight and recoupment policies, procedures and protocols to comply with new specialty mental health services 	
	 policies Updated audit, oversight and recoupment policies, procedures and protocols to comply with new specialty mental health services criteria, 	
	 policies Updated audit, oversight and recoupment policies, procedures and protocols to comply with new specialty mental health services criteria, assessment 	
	 policies Updated audit, oversight and recoupment policies, procedures and protocols to comply with new specialty mental health services criteria, assessment domains, 	
	 policies Updated audit, oversight and recoupment policies, procedures and protocols to comply with new specialty mental health services criteria, assessment 	
	 policies Updated audit, oversight and recoupment policies, procedures and protocols to comply with new specialty mental health services criteria, assessment domains, 	
	 policies Updated audit, oversight and recoupment policies, procedures and protocols to comply with new specialty mental health services criteria, assessment domains, documentation 	

DHCS 8761 (12/2021)

	behavioral	
	health policies,	
	aligned with	
	new DHCS	
	auditing and	
	recoupment	
	standards	
	of	
	communication/	
	training with	
	providers.	
9/29/23 F	Required:	
	High-level	
	summary of audit	
	esults, including	
	otal funding	
	amounts recouped	
	rom providers, by	
	eason for	
	ecoupment (per	
	DHCS policy, imited to evidence	
	of fraud waste	
	and/or abuse; with	
	corrective action	
	plans and/or other	
-	administrative	
	sanctions used for	
	noncompliance	
-	vith	
	ocumentation and	
	other compliance	
S	standards)	

Milestone 2e:

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:

 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.

- Criteria to access Specialty Mental Health Services (SMHS) for adults and for children (including criteria related to trauma, child welfare involvement, and homelessness)
- Mandatory screening and transition tools for specialty and non-specialty mental health
- Documentation requirements and assessment standards (SMHS and DMC, DMC-ODS)
- No wrong door (SMHS)
- Co-occurring diagnoses (SMHS and DMC, DMC-ODS)
- Treatment during assessment period, prior to diagnosis (SMHS and DMC, DMC-ODS)

Due Date	Required Deliverables (as developed by DHCS)	Deliverables Developed by Entity	Action Steps
9/30/22	Required: Submit updated policies and procedures reflecting all CalAIM behavioral health policy changes listed under milestone 2e. Required: Document training plan inclusive of the new CalAIM policies in milestone 2e, including participation of staff in training • Include information on training made available to subcontract ed providers and		

	describe	
	how the	
	MHP, DMC,	
	or DMC-	
	ODS has	
	supported	
	and	
	monitored	
	timely	
	participation	
	in trainings	
	for its	
	subcontract	
	Ors.	
3/1/23	Required:	
	Describe how new	
	providers will be	
	trained in CalAIM	
	policies under	
	milestone 2e,	
	through training manuals and/or	
	asynchronous on-	
	line learning.	
9/30/23	Example:	
	Submit updated	
	quality improvement plan	
	or other evidence	
	to demonstrate	
	how the MHP,	
	DMC or DMC-ODS	
	will provide	
	ongoing training,	
	support, and	
	monitoring to	
	implement the	
	CalAIM policies	
	under milestone	
	2e.	

Section 4:

Goal 3: Data Exchange

Please provide key deliverables and the action steps necessary to achieve each deliverable using the tables below.

Deliverables: DHCS includes deliverables as examples; a participating entity may replace these with their own deliverables, or add new deliverables, as long as they lead to meeting the goal by the deadline. Deliverables labeled **required** are required for all participating entities.

Action Steps: These are to be defined by the participating entity – what tasks need to be completed to meet the deadline for the deliverable?

Milestone 3a: Demonstrate improved data exchange capabilities.

Option 1:

Demonstrate direct sharing of data with MCPs

Due Date	<u>Required</u> Deliverables (as developed by DHCS)	Deliverables Developed by Entity	Action Steps
9/30/22	Required: A copy of signed data-sharing agreement between the participating entity and the MCP(s).		
3/1/23	Required: A copy of a data- sharing transaction log or a de- identified HL7 message (or other equivalent documentation) to and from the MCPs and participating entity.		

Option 2:

Demonstrate onboarding to a Health Information Exchange (HIE)

Due Date	Required Deliverables (as developed by DHCS)	Deliverables Developed by Entity	Action Steps
9/30/22	Required: A copy of signed California Data Use and Reciprocal Support Agreement (CalDURSA) and California Trusted Exchange Network (CTEN) to onboard with HIE that has done the same.		
3/1/23	Required : A copy of a transaction log or a de-identified HL7 message (or other equivalent documentation) to and from the HIE and county		

|--|--|--|

Milestone 3b:

Demonstrate an active Fast Healthcare Interoperability Resources (FHIR) application programming interface (API) that will allow the participating entity to be compliant with CMS-mandated interoperability rules

Due Date	Required Deliverables (as developed by DHCS)	Deliverables Developed by Entity	Action Steps
9/30/22	Participating entity to determine deliverable		
3/1/23	Required: Signed attestation form from the county that certifies the implementation of the FHIR API.		
	Required: Submit a log of successful FHIR transactions (de- identified) over a six month period in 2023		

Milestone 3c:

Demonstrate that the participating entity has mapped data elements to the United States Core Data for Interoperability (USCDI) standard set

Due Date	Required Deliverables (as developed by DHCS)	Deliverables Developed by Entity	Action Steps
9/30/22	Required:		
	Signed attestation form and other supporting documentation from the participating entity that certifies that the county has begun the process of mapping data elements to the USCDI		
3/1/23	Participating entity to determine deliverable		
9/30/23	Required:		
	Signed attestation form from the participating entity that certifies that data elements have been successfully mapped to USCDI		
	AND		
	Submit documentation outlining the mapped data elements		

Milestone 3d:

DHCS 8761 (12/2021)

Leverage improved data exchange capabilities to improve quality and coordination of care.

This milestone relates to the following measures:

- Follow-up After Emergency Department Visit for Alcohol and Other Drug Abuse or Dependence (FUA)
 - Measure specification can be found on page 63
- Follow-up After Emergency Department Visit for Mental Illness (FUM)
 Measure specification can be found on page 70
- Pharmacotherapy for Opioid Use Disorder (POD)
 - Example measure specification can be found here.

Due Date	Required Deliverables (as developed by DHCS)	Deliverables Developed by Entity	Action Steps
9/30/22	Required: Submit a quality improvement plan (DHCS to provide template and assist with the provision of data to achieve this deliverable) to improve performance on FUA, FUM, and POD during the measurement period of July 1, 2022 – June 30, 2023. Quality improvement plans should include how the participating entity will leverage improved data exchange capabilities to achieve improved performance.		
3/1/23	Required: In collaboration		

with DHCS, report	
baseline	
performance rate	
(July 1, 2021 –	
June 30, 2022) for	
FUA, FUM, and	
POD and 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).	
9/30/23 Required:	
Submit final	
performance rate	
(July 1, 2022 –	
June 30, 2023) for	
FUA, FUM, and	
POD and provide	
updated narrative	
on projects,	
challenges,	
lessons learned,	
and next steps	
related to quality	
improvement on	
these measures	
(DHCS to provide	
template).	

Section 5: Technical Assistance and Training

All BHQIP participating entities are required to complete virtual trainings and technical assistance provided by DHCS or designees to support implementation of CaIAIM policies. The training schedule will be communicated to counties in a separate BHIN.

DHCS will run reports of each participating entity participation in trainings. Participating entities are eligible to receive 100% of the available incentive per reporting period, based on completion of milestones, if at least one staff from the MHP and at least one staff from the DMC or DMC-ODS (the same individual who attended the MHP training can attend the DMC and DMC-ODS trainings) are documented to have attended at least one webinar for each BHQIP goal (either synchronously, or asynchronously). If DHCS is unable to verify attendance, the participating entity will be required to submit documentation of which staff attended on which date. If no attendance can be verified, DHCS reserves the option to deduct 5% from the incentive payment.

Please acknowledge your understanding and acceptance of this responsibility below.

□ I understand and accept the responsibility to participate in all three webinar trainings run by DHCS or their designees.

Section 6: Certification

I hereby certify that all information provided in this IP is true and accurate to the best of my knowledge, and that this plan has been completed based on a thorough understanding of program participation requirements as specified in BHIN No. 21-074

Behavioral Health Director's Name:	
Signature :	
Date Signed:	

Acceptance of a BHQIP award shall constitute acceptance of the terms and conditions described herein. The terms of the BHQIP award include the participating entity's IP, as approved by DHCS.