

February 29, 2024

To: Tribal Chairpersons, Designees of Indian Health Programs, and Urban Indian Organizations

Subject: Addendum to Notice of Proposed Change to the Medi-Cal Program

The purpose of this letter is to provide an update to the Tribal Notice for State Plan Amendment (SPA) 24-0015, released on February 23, 2024. The enclosed update provides information regarding not adding Psychological Associate services to the list of billable FQHC, RHC, and Tribal FQHC services.

If additional information is needed, please send an email to Angeli.Lee@dhcs.ca.gov or by mail to the address below:

Contact Information

Department of Health Care Services
Director's Office
ATTN: Angeli Lee
MS 0000
P.O. Box 997413
Sacramento, CA 95899-7413

Please note that Indian Health Programs and Urban Indian Organizations may request a consultation on this proposal at any time as needed.

Sincerely,

Original signed by

Andrea Zubiato, Chief
Office of Tribal Affairs
Department of Health Care Services

Enclosure



**Department of Health Care Services (DHCS)
Tribal and Designees of Indian Health Programs Notice
Addendum**

PURPOSE

The purpose of this addendum is to inform Tribal Chairpersons and Designees of Indian Health Programs and Urban Indian Organizations that Psychological Associate services are not being added to the list of billable FQHC, RHC, and Tribal FQHC services effective April 1, 2024 through State Plan Amendment (SPA) 24-0015. DHCS will only seek to add Associate Professional Clinical Counselor (APCC) services through this proposed SPA.

BACKGROUND

There is a significant unmet need for behavioral health specialists, due to the Medi-Cal member demand for these services and the existing shortage of staff. Associate Professional Clinical Counselors (APCCs) are graduate-level health care professionals trained to evaluate an individual's behavioral health and use therapeutic techniques based on specific training programs. Allowing Federally Qualified Health Centers (FQHCs), Rural Health Clinics (RHCs), and Tribal FQHCs to bill for APCC services will increase access to behavioral health services for Medi-Cal members in medically underserved, rural, and remote areas in California. APCC services provided under supervision of a licensed health professional are currently included in the Medi-Cal State Plan for non-FQHC providers under Psychology and Counseling services, and as health professionals for Indian Health Services Memorandum of Agreement 638 clinics (IHS-MOA clinics). APCCs are not licensed and are therefore not billable practitioners. APCC services will be billed under the National Provider Identifier (NPI) of a qualified, licensed supervising health care practitioner.

SUMMARY OF PROPOSED CHANGES

DHCS plans to submit SPA 24-0015 to CMS with a proposed effective date of April 1, 2024. The SPA seeks to authorize APCC services as eligible reimbursable Medi-Cal behavioral health services, when provided under supervision of a qualified, licensed health professional to patients served by FQHCs, RHCs, and Tribal FQHCs.

IMPACT TO TRIBAL HEALTH PROGRAMS (THPs)

DHCS does not anticipate an impact to THPs if they participate in Medi-Cal as an IHS-MOA clinic as APCCs are currently billable providers. However, if a THP participates in Medi-Cal as a Tribal FQHC, this proposed SPA will make services provided by APCCs supervised by a qualified, licensed health professional billable. Adding APCC services to the list of behavioral health services at Tribal FQHCs will expand flexibility and access for Medi-Cal members to receive the various behavioral health services they need.

IMPACT TO FEDERALLY QUALIFIED HEALTH CENTERS (FQHCs)

To the extent that FQHCs and RHCs provide behavioral health services, this SPA is expected to expand access by increasing the number of health care professionals eligible to provide these services to Medi-Cal members served by FQHCs and RHCs. Adding APCC

services to the list of behavioral health services will expand flexibility and access for Medi-Cal members to receive the various behavioral health services they need.

IMPACT TO AMERICAN INDIAN MEDI-CAL MEMBERS

As a result of this proposal, American Indian Medi-Cal members served by FQHCs, RHCs, and Tribal FQHCs will have increased access to behavioral health services, which may improve health outcomes for those receiving services.

CONTACT INFORMATION

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