

# Screening & Transition of Care Tools BHIN/APL Updates

June 18, 2025

# Agenda

- » Screening and Transition of Care Tools BHIN/APL Revisions
  - Screening Tool Overrides
  - Provider Referrals
- » Compliance & Technical Assistance
- » Q&A

# **Screening and Transition of Care Tools**

## **BHIN/APL Revisions: Screening Tool**

### **Overrides**



# Override Policy Development

- » The Screening and Transition of Care Tools are used by Behavioral Health Plans (BHPs) and Managed Care Plans (MCPs) and to guide Medi-Cal member referrals to the **appropriate mental health delivery system**.
- » After initial implementation of the initiative, stakeholders requested the ability for providers to override a Screening Tool score in **certain circumstances where members are led to the wrong system of care** (e.g., the Screening Tool score does not capture the need for Specialty Mental Health Services (SMHS) in members who are unable to respond to questions due to serious mental health symptoms).
- » Policy development focused on creating a process that would allow for flexibility to override a score in these instances and streamline service access for members.

# Override Policy Development (cont.)

- » From July to September 2024, DHCS convened stakeholder workgroups to inform the design of the override policy.
- » Stakeholder workgroups discussed:
  - Which screeners may override the Screening Tool score;
  - Criteria for overriding the score; and
  - Compliance and tracking procedures.

# Override Policy: Screeners Allowed to Override

- » **Administration** of the Screening Tool can be completed by designated staff, licensed or unlicensed. However, **overriding** the Screening Tool shall only be performed by specified practitioners of SMHS/NSMHS as defined by the State Plan for SMHS, the provider manual for NSMHS, and the revised BHIN/APL.
  - SMHS: [California Medicaid State Plan – Rehabilitative Mental Health Services](#)
  - NSMHS: [Psychiatric and Psychological Services Manual](#)
- » BHPs/MCPs are responsible for ensuring that all practitioners deliver services within their scope of practice under California law.

# Override Policy: Criteria for Overriding a Score

- » To override, the BHP/MCP practitioner must provide a rationale and additional context for overriding the Screening Tool score based on the following options:
  - Additional information was provided during the screening indicating a **higher level** of services than NSMHS is needed (MCP -> BHP).
  - Additional information was provided during the screening indicating a **lower level** of services than SMHS is needed (BHP -> MCP).

# Override Policy: Tracking Overrides

- » BHPs/MCPs are required to record all overrides provided, as well as the practitioner's rationale for each override.
- » BHPs/MCPs may choose how this tracking occurs (e.g., EHR, excel spreadsheet).
- » BHPs/MCPs must share the rationale for a Screening Tool override when referring a member to the appropriate Medi-Cal mental health delivery system.
- » DHCS does not require formal reporting at this time. However, overrides are subject to auditing and BHPs/MCPs must provide records, including the override rationale, to DHCS upon request.



# **Screening and Transition of Care Tools**

## **BHIN/APL Revisions: Provider Referrals**



# Provider Referrals Policy

- » DHCS received many questions from stakeholders around provider referrals including:
  - Whether the Screening Tools should be used if a **member is referred for services directly from their provider.**
  - Uncertainty around whether the Screening Tools are required if a provider is contacted directly by a member, but the provider is a **county-owned or county-operated provider.**
- » Stakeholders requested that previous DHCS guidance on this topic be incorporated in the BHIN/APL revisions.

# Provider Referrals Policy (cont.)

- » DHCS has updated the Screening and Transition of Care Tools BHIN/APL to further clarify the provider referral process.

*"The Adult and Youth Screening Tools are not intended for use if a practitioner refers a member to an MCP/BHP for NSMHS/SMHS based on an understanding of the member's needs and using their own clinical judgment. This is inclusive of county-owned and county-operated providers."*

*"...use the Screening and Transition of Care Tools for members under age 21 (youth) and for members ages 21 years and older (adults) unless the member is currently receiving mental health services through the MCP or BHP; or referred directly to a mental health delivery system by a practitioner based on an understanding of the member's needs and using their own clinical judgment; or the member reaches out directly to the mental health delivery system."*

# **Compliance & Technical Assistance**



# Revised BHIN/APL

- » The revised BHIN/APL was issued through [BHIN 25-020](#) and [APL 25-010](#) on June 3, 2025.
- » BHPs/MCPs shall:
  - Update written P&Ps to align with the requirements of this BHIN/APL;
  - Provide additional training as needed; and
  - Monitor adherence to the new requirements.

MCPs must submit either their updated P&Ps or an attestation of no change to the Managed Care Operations Division (MCOD)-MCP Submission Portal within **90 days** from the APL release date.

# Available Resources

- » BHPs/MCPs can continue to submit questions about the Screening and Transition of Care Tools BHIN/APL updates to [BHCalAIM@dhcs.ca.gov](mailto:BHCalAIM@dhcs.ca.gov).
- » DHCS is releasing additional resources to clarify the new policies and processes (e.g., updates to the [Screening and Transition of Care Tools FAQs](#)).
- » Updated training modules, including information on overrides and provider referrals, have been released by CalMHSA.

# Questions?

Please reach out to [BHCalAIM@dhcs.ca.gov](mailto:BHCalAIM@dhcs.ca.gov)