



INTERIM INSTRUCTION NOTICE #22-002

December 29, 2022

SUBJECT: Documentation of Co-Occurring Disorders

DISTRIBUTION: All Department
of Behavioral Health
and Contract Agency
Staff

OBSOLETE: Upon completion of related
MH and SUD Manuals

Effective Date July 1, 2022

From Department of Behavioral Health (DBH) Quality Management (QM)

Introduction The purpose of this Interim Instruction Notice (IIN) is to inform San Bernardino County (County) DBH and contract agency staff of changes regarding the documentation of co-occurring treatment and diagnoses. This IIN applies to both Specialty Mental Health Services (SMHS) and Drug Medi-Cal Organized Delivery System (DMC-ODS)/Substance Use Disorder and Recovery Services (SUDRS).

Co-Occurring Treatment Individuals may experience mental health and substance use disorders concurrently, therefore requiring co-occurring treatment services. Concurrent mental health and substance use disorder conditions may be treated via “co-occurring treatment,” with clinically appropriate services covered by Medi-Cal in both SMHS and DMC-ODS/SUDRS delivery systems. All services shall be delivered within the rendering provider’s scope of practice. In some instances, a SMHS provider may need to refer a client to DMC-ODS/SUDRS, with the appropriate authorization by the client, based on the substance use severity and/or need of the client.

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Co-Occurring Treatment, continued

Prior to July 1, 2022, SMHS would have been disallowed (non Medi-Cal reimbursable) when a rendering provider documented a client's substance use disorder diagnosis or referenced Substance Use Disorder and Recovery Services (SUDRS) treatment in the chart documentation. With the implementation of California Advancing and Innovating Medi-Cal (CalAIM) Documentation Redesign, both SMHS and DMC-ODS/SUDRS rendering providers may document symptomology, treatment and other pertinent information reported by the client regarding the substance use disorder. One of the tenets of CalAIM Documentation Redesign is for rendering providers to address the entirety of an individual's presented challenges (both SMHS and DMC-ODS/SUDRS) and "meet them where they're at".

Co-Occurring Diagnosis

Services are now considered covered and reimbursable by Medi-Cal when the person in care has a co-occurring mental health condition and substance use disorder, even when the DMC-ODS/SUDRS diagnosis is later determined to be the primary diagnosis.

Responsibilities for covered services by each of the service delivery systems (SMHS or DMC-ODS/SUDRS) remains in place, with each delivery system responsible for providing covered services per applicable contracts with the Department of Health Care Services.

Questions

For questions regarding this Interim Instruction Notice, please contact DBH Quality Management at 909-386-8227 or via email at QualityManagementDivision@dbh.sbcounty.gov.
