

M E M O R A N D U M

Date: August 13, 2020
To: DMC-ODS Treatment Providers
From: Santa Barbara County Behavioral Wellness 
Subject: COVID-19 Modifications to DMC-ODS Residential Treatment Limits
CC: ADP, Fiscal, QCM, ACCESS

This memo provides information regarding temporary modifications to existing limits on DMC-ODS Residential Treatment episodes for Medi-Cal beneficiaries. Due to the COVID-19 public health emergency (PHE), the limitation on 2 non-continuous 90-day regimens per year and the current 30-day (for adolescents) and 90-day (for adults) maximums for a single residential stay have been suspended during the public health emergency. This modification will allow further treatment, when medically necessary, in light of the unforeseen impact of COVID-19. Please see below for further details and guidance.

On April 3, 2020, California submitted an application to amend its Medi-Cal 2020 section 1115(a) demonstration to address the COVID-19 public health emergency (PHE). After several discussions with the state and Subject Matter Experts, Centers for Medicare and Medicaid Services (CMS) determined that the state could effectuate the requested changes to the outlined programs through a revision to the state's Standard Terms and Conditions (STC) and the associated protocols. In accordance with this determination, CMS approved the following modifications:

Drug Medi-Cal Organized Delivery Systems (DMC-ODS) Modifications

- Modification to suspend the following limits on residential treatment for DMC-ODS beneficiaries impacted by the COVID-19 emergency:
 - Modification to the STCs to suspend the limitation on 2 non-continuous 90-day regimens per year during the PHE
 - Modification to the STCs to suspend the current 30-day (for adolescents) and 90-day (for adults) maximums for a single residential stay, during the PHE.

MEDICAL NECESSITY:

While this modification allows Behavioral Wellness increased flexibility in authorizing additional or extended residential treatment, *beneficiaries must demonstrate a continued medical necessity for the corresponding level of care.*

Residential Treatment Services is a 24/7 non-medical, short-term residential program that provides rehabilitation services to beneficiaries with a substance use disorder diagnosis when determined by a Medical Director or LPHA as medically necessary and in accordance with the individual treatment plan. Please refer to the ADP DMC-ODS Practice Guidelines & Procedure Manual for more information on Medical Necessity.

As always, this will be individualized and documented in the client record with a comprehensive assessment and/or an ASAM demonstrating the need for residential SUD treatment, and reviewed by QCM for approval. The existing procedure for treatment providers to request initial or extension authorization will remain the same. Should an extension be indicated, the request should be received by QCM no later than 5 days prior to the last authorized day of current treatment period. QCM authorizations will continue to be for up to 30 days maximum at a time.

Please do not hesitate to reach out to bwelqcmadp@sbcbswell.org if you have any questions now or in the future.

Thank you,
BWELL QCM ADP