

Guidance for Licensed Behavioral Health Agencies (BHA) Accepting Substance Use Disorder (SUD) Assessments

The department of health (DOH) and health care authority (HCA) have received a frequently asked question regarding the ability of a licensed behavioral health agency (BHA), certified to provide substance use disorder (SUD) services, to accept an SUD assessment from a non-BHA such as a private practice, primary care clinic, etc.

DOH BHA licensing rules (Chapter 246-341 WAC) do not prohibit an agency from accepting an SUD assessment from a non-BHA. HCA's Service Encounter Reporting Instructions (SERI) guide does contain language stating that an SUD assessment must be conducted by a licensed BHA. However, this language is directly related to reimbursement for the assessment, meaning that to be reimbursed by Medicaid or state/block grant funding the assessment must be conducted by a BHA. HCA will be revising the language in SERI to further clarify the intention and application of this language. Additionally, possible amendments to the Medicaid State Plan in 2023 may directly impact policies around reimbursement in 2024. To learn more about state plan amendments, please visit (https://www.hca.wa.gov/assets/23-0010-BehavioralHealthServicesPublicNotice-WSR-23-04-002.pdf). In the meantime, agencies may accept non-BHA assessments for the purpose of initiating treatment.

Accepting a non-BHA assessment is optional for the BHA. If an agency chooses to accept a non-BHA assessment the agency must assure the assessment:

- Has been completed within the last 12 months and that client circumstances which would impact the assessment have not changed. The agency may include an addendum to the assessment to address any changes.
- Was conducted using ASAM criteria and meets the requirements in <u>WAC 246-341-0640</u> or include an addendum so that all ASAM criteria are covered.
- Was conducted by a WA state licensed or credentialed professional that has assessment and diagnosis in their scope of practice. The licensed or credentialed professionals who can assess or diagnose substance abuse or addiction issues within the standard of care depends on the individual practitioner's skill, training, experience, and other factors.

Contact Information:

Questions related to BHA Licensing and Certification Requirements – Email the BHA program manager

Questions related to billing, please contact the WA State Health Care Authority