

Diagnostic Impressions in Substance Use Treatment Services

Substance Use System Considerations – Past and Present

Credentialed counselors operating within the structure of state-licensed facilities are at the core of the Kansas public substance use treatment system.

Counselors have specialized, focused training and practice in a narrow scope of treatment services, providing a limited array of behavior-focused interventions for people with substance use disorders.

Counselors in public-funded programs administer the Kansas Clinical Placement Criteria (KCPC), a structured assessment instrument that addresses six dimensions of a biopsychosocial evaluation. Assessment is based on national standards developed by the American Society of Addiction Medicine (ASAM). The KCPC walks the counselor through a comprehensive evaluation of the person's current substance use-related behavior and treatment needs, which leads to the development of a diagnostic impression and a level of care recommendation. Every KCPC, every resulting diagnostic impression, and every level of care recommendation is reviewed by licensed clinicians, who have full authority to issue diagnoses. Licensed clinicians are facility staff, contractors or licensed clinicians employed by the substance use community-based managed care contractor, ValueOptions-Kansas.

Credentialed substance use counselors are critical to the success of Kansas' public substance use treatment system. Barring credentialed counselors from providing diagnostic impressions would unnecessarily strip the public behavioral health system of a valuable resource. In July 2007 SRS implemented system enhancements and initiated the CMS-approved substance use managed care program. SRS contracted with ValueOptions-Kansas to supplement existing licensed clinician resources with licensed clinicians on ValueOptions' staff.

Safeguards, Reviews and Oversight of Programs

There are numerous safeguards in place across the Kansas public substance use treatment system to ensure that counselor and clinician practices are strong and effective. Those safeguards include:

- SRS licensure of all programs that provide substance use treatment services. From the birth of Kansas' system in the early 1970's, SRS has

licensed all facilities providing substance use treatment and has administered extensive regulations and standards of care for those programs (pursuant to K.S.A. 65-4012, et seq.). Those standards have included protection of consumers, quality assurance features, and regular on-site reviews to assess and enforce compliance.

- Credentialing of all providers who are part of the ValueOptions-Kansas network of Medicaid or block grant funded substance use treatment system.
- SRS credentialing of all counselors performing substance use treatment services within licensed facilities.
- Pre-credentialing and ongoing continuing education requirements, resulting in significant specialized training in substance use disorders.
- Structured, comprehensive assessment system, as discussed above, resulting in a multi-layered evaluation of each person's needs and the clinical review of findings.
- Quality assessment and program compliance reviews, covering all aspects of treatment evaluation, delivery and documentation, by both internal and external entities, including:
 - ValueOptions-Kansas' utilization management and medical necessary reviews.
 - External Quality Review Organization federally-required reviews conducted by Kansas Foundation for Medical Care, which include both clinical, administrative and health information system reviews.
 - Annual on-site program licensing reviews by SRS licensing staff, as well as annual on-site review of ValueOptions-Kansas by SRS contract monitoring staff.
 - Referral to and cooperation with the Attorney General's Medicaid Fraud and Abuse division, concerning any report of fraud or abuse in Medicaid-funded services.
 - Centers for Medicare and Medicaid reviews, which include:
 - Approval of Medicaid state plan provisions, waiver applications, and managed care contracts/amendments.
 - Medicaid Integrity Reviews.
 - Biannual managed care reviews.
 - Biannual independent assessment reviews conducted by third party entities.
 - Financial management reviews.

The standard of care for substance use treatment services is well met by the current system, including the use of diagnostic impressions by specialty trained counselors in licensed facilities as part of a licensed clinician-reviewed and nationally-structured assessment process. SRS supports continuing that practice.

OFFICE OF THE SECRETARY

Docking State Office Building, 915 SW Harrison, Street, 6th Floor, Topeka, Kansas 66612-1570
Voice: (785) 296-3271 • Fax: (785) 296-4685 • TTY: (Hearing Impaired) (785) 296-3487