



Scope of Practice Matrix for Clinical Activities (non-Medication) – MH and SUD

Categories for Behavioral Health Providers	Authorize Behavioral Health Services	DHCS Adult / Youth Screening	MSE	Diagnosis	Finalizing MH Assessment	Finalizing ASAM	Finalizing Care Plans	Problem List	Psych Testing
Physician	Yes	Yes	Yes	Yes	Yes	Yes ⁷	Yes	Yes	No ⁸
Nurse Practitioner	Yes	Yes	Yes	Yes	Yes	Yes ⁷	Yes	Yes	No ⁸
RN with Master's Degree in Psychiatric/MH Nursing	Yes	Yes	Yes	Yes	Yes	Yes ⁷	Yes	Yes	No ⁸
RN	Yes	Yes	No ⁸	No	No	No	Yes	Yes ⁶	No
LVN/LPT	PES only	Yes	No	No	No	No	No	Yes ⁶	No
Psychologist	Yes	Yes	Yes	Yes	Yes	Yes ⁷	Yes	Yes	Yes
Psychologist Candidate (post PhD and DHCS Waiver of Licensure)	Yes	Yes	Yes	Yes	Yes	Yes ⁷	Yes	Yes	Yes
LCSW/LMFT/LPCC	Yes	Yes	Yes	Yes	Yes	Yes ⁷	Yes	Yes	No ⁸
ASW/AMFT/APCC (post Master's degree and registered with the BBS)	Yes	Yes	Yes	Yes	Yes	Yes ⁷	Yes	Yes	No ⁸
Clinical Trainee ¹	No	Yes	Yes ^{4, 6}	Yes ^{4, 6}	Yes ^{4, 6}	Yes ^{4, 6, 7}	Yes ^{4, 5}	Yes ^{4, 6}	Yes ^{4, 6}
Licensed Occupational Therapist	No	Yes	No	No	No	No	No	Yes ⁶	No
Certified Peer Support Specialist	No	Yes	No	No	No	No	No	Yes ⁶	No



For Clinical Activities (non-Medication) – MH Programs Only

Categories for Behavioral Health Providers	Authorize Behavioral Health Services	DHCS Adult / Youth Screening	MSE	Diagnosis	Finalizing MH Assessment	Finalizing ASAM	Finalizing Care Plans	Problem List	Psych Testing
Mental Health Counselor	No	Yes	No	No	No	N/A	No	Yes ⁶	No
Mental Health Rehabilitation Specialist (MHRS) ²	No	Yes	No	No	No	N/A	No	Yes ⁶	No
Other Staff with qualifying MH experience ³	No	Yes	No	No	No	N/A	No	Yes ⁶	No
Other Staff without qualifying MH experience	No	Yes	No	No	No	N/A	No	Yes ^{4,6}	No

For Clinical Activities (non-Medication) – SUD Programs Only

Categories for Behavioral Health Providers	Authorize Behavioral Health Services	DHCS Adult / Youth Screening	MSE	Diagnosis	Finalizing MH Assessment	Finalizing ASAM	Finalizing Care Plans	Problem List	Psych Testing
Certified AOD Counselor (ACCBC, CADTP, CCAPP)	No ⁵	N/A	N/A	No ⁵	N/A	No ⁵	No ⁵	Yes ⁵	No
Registered AOD Counselor (ACCBC, CADTP, CCAPP)	No ⁵	N/A	N/A	No ⁵	N/A	No ⁵	No ⁵	Yes ⁵	No
AOD Counselor	No ⁵	N/A	N/A	No ⁵	N/A	No ⁵	No ⁵	Yes ⁵	No
Other Staff without qualifying AOD experience	No	N/A	N/A	No	N/A	No	No	No	No



- 1 **Clinical Trainee:** A clinical trainee is an unlicensed individual who is enrolled in a post-secondary educational degree program in the State of California that is required for the individual to obtain licensure as a Licensed Mental Health Professional; is participating in a practicum, clerkship, or internship approved by the individual's program; and meets Professional; is participating in a practicum, clerkship, or internship approved by the individual's program; and meets all relevant requirements of the program and/or applicable licensing board to participate in the practicum, clerkship or internship and provide rehabilitative mental health services, including, but not limited to, all coursework and supervised practice requirements. **Clinical Trainee Categories include:**
 - A. **Medical Student in Clerkship** - According to the Accreditation Council for Graduate Medical Education (ACGME), a clerkship is an educational experience of planned activities in selected settings, over a specific period, developed to meet specific goals and objectives of the program. A medical student in clerkship has been introduced to the core competencies of medical and objectives of the program. A medical student in clerkship has been introduced to the core competencies of medical education at the beginning of their medical school curriculum and will have demonstrated competence in those skills prior to clerkship/rotation.
 - B. **LCSW, LMFT or LPCC Clinical Trainee**
 - C. **Psychologist Clinical Trainee**
 - D. **Registered Nurse Clinical Trainee**
 - E. **Vocational Nurse Clinical Trainee**
 - F. **Psychiatric Technician Clinical Trainee**
 - G. **Occupational Therapist Clinical Trainee**
 - H. **Nurse Practitioner/Clinical Nurse Specialist Clinical Trainee**
- 2 **Mental Health Rehabilitation Specialist (MHRS)** A mental health rehabilitation specialist shall be an individual who has a baccalaureate degree and four years of experience in a mental health setting as a specialist in the fields of physical restoration, social adjustment, or vocational adjustment. Up to two years of graduate professional education may be substituted for the experience requirement on a year-for-year basis; up to two years of post- associate arts clinical experience may be substituted for the required educational experience in addition to the requirement of four years experience in a mental health setting.
- 3 **"Other Staff" with MH experience** includes staff who do not qualify under any of the other staff categories listed in the matrix. Staff with **"qualifying MH experience"** includes having a BA/BS in a mental health related field and/or having two years of work experience in the MH field.
- 4 **Allowed if operating under the direct supervision of an LPHA/LMHP** – Direct supervision for behavioral health services typically refers to the oversight and guidance provided by a licensed and qualified supervisor who is responsible for the work of a less experienced or less credentialed individual providing behavioral health services. The supervisor is usually someone with appropriate licensure or credentials in the relevant field, such as psychology, social work, counseling, or a related discipline.
- 5 **Must show documentation that an LPHA and AOD Registered/Certified Counselor met to review the clinical information.** AOD Registered/Certified Counselors may add information into the ASAM and care plans, and the LPHA would complete the care plan, Diagnosis and medical necessity determinations. The documentation must be clear so that it demonstrates that an AOD Registered/Certified Counselor is not acting out of scope of practice.
- 6 **May only do so as long as acting within the staff's scope of practice.** For example, a Peer Support Specialist may add Social Determinants of Health to the Problem List, but cannot add a mental health diagnosis to the Problem List. An Occupational Therapist may only conduct activities within the scope of practice of an occupational therapist – they may not do activities such as diagnosing or assessing a psychiatric condition.
- 7 **May only do if certified in administering the ASAM.**
- 8 **Approval from Director Needed** – Staff with specific training and experience may qualify upon approval of the Mental Health Director and subsequent state regulation.

The BHRS system is currently only set up to bill for Clinical Trainees under the LMSW/LMFT/LPCC category. If your program/agency would like to start billing for another clinical trainee type, contract QM at HS_BHRS_QM@smcgov.org.



Scope of Practice Matrix for Medication Related Activities – MH and SUD

Categories for Behavioral Health Providers	Medication Administration (Not Injection)	Medication Administration (Injection)	Medication Dispensing	Medication Prescribing	Medication Support	DMC-ODS Residential Services Medication Monitoring
Physician	Yes	Yes	Yes	Yes	Yes	Yes
Nurse Practitioner	Yes	Yes	Yes	Yes w disp approval	Yes	Yes
RN with Master's Degree in Psychiatric/MH Nursing	Yes	Yes	Yes ◇	No	Yes	Yes
RN	Yes	Yes	Yes ◇	No	Yes	Yes
LVN/LPT	Yes	Yes	No	No	Yes	Yes
Psychologist	No	No	No	No	No	Yes
Psychologist Candidate (post PhD and DHCS Waiver of Licensure)	No	No	No	No	No	Yes
LCSW/LMFT/LPCC	No	No	No	No	No	Yes
ASW/AMFT/APCC (post Master's degree and registered with the BBS)	No	No	No	No	No	Yes
Clinical Trainee*	No	No	No	No	No	Yes
Licensed Occupational Therapist	No	No	No	No	No	Yes
Certified Peer Support Specialist	No	No	No	No	No	Yes

◇ RNs may dispense if trained in dispensing and follow the guidelines set forth in [BHRS Policy 91-19](https://www.smchealth.org/bhrs-doc/dispensing-prescription-drugs-registered-nurses-91-19) (<https://www.smchealth.org/bhrs-doc/dispensing-prescription-drugs-registered-nurses-91-19>)



For Medication Related Activities – MH Programs Only

Categories for Behavioral Health Providers	Medication Administration (Not Injection)	Medication Administration (Injection)	Medication Dispensing	Medication Prescribing	Medication Support	DMC-ODS Residential Services Medication Monitoring
Mental Health Counselor	No	No	No	No	No	N/A
Mental Health Rehabilitation Specialist (MHRS)	No	No	No	No	No	N/A
Other Staff with qualifying MH experience ³	No	No	No	No	No	N/A
Other Staff without qualifying MH experience	No	No	No	No	No	N/A

3 “Other Staff” with MH experience includes staff who do not qualify under any of the other staff categories listed in the matrix. Staff with **“qualifying MH experience”** includes having a BA/BS in a mental health related field and/or having two years of work experience in the MH field.

For Medication Related Activities – SUD Programs Only

Categories for Behavioral Health Providers	Medication Administration (Not Injection)	Medication Administration (Injection)	Medication Dispensing	Medication Prescribing	Medication Support	DMC-ODS Residential Services Medication Monitoring
Certified AOD Counselor (ACCBC, CADTP, CCAPP)	No	No	No	No	No	Yes
Registered AOD Counselor (ACCBC, CADTP, CCAPP)	No	No	No	No	No	Yes
AOD Counselor	No	No	No	No	No	Yes
Other Staff without qualifying AOD experience	No	No	No	No	No	No



Contribute

- May add information that falls within the staff's scope of practice.
- Save contribution as "Draft"
- May NOT submit as "Final" even with co-signature
- Avatar Users: Use "To Do" feature rather than "Document Routing" to send notification to primary clinician or supervisor that you have added information.



Finalize with Co-Signature

- May finalize (submit as "Final") but requires a co-signature from an LPHA for whom it is within their scope of practice to do so.
- Only staff who are under certain categories of licensed/waivered/registered or clinical trainees may do so.
- Avatar Users: Use "Document Routing" to request co-signature.



Finalize without Co-Signature

- May finalize (submit as "Final") without needing approval from Supervisor or other Co-Signer.
- Not all LPHAs may finalize all types of clinical documents. Only staff who are under certain categories of licensed/waivered/registered or clinical trainees may do so.
- For example which Licensed Occupational Therapists are LPHAs, they cannot diagnose a psychiatric condition and therefore cannot finalize an assessment.