

Frequently Asked Questions: 2021-2016 Substance Use Disorder (SUD) Medicaid 1115 Waiver and American Society of Addiction Medicine Criteria

Where can I find current information about the SUD waiver?

The Oregon Health Authority (OHA) maintains [a web page for this project](#) which has links to recorded meetings and documents. Future updates will be posted here.

What does the approved waiver say about using the ASAM tools?

Oregon's SUD continuum of care shall be based on the American Society of Addiction Medicine (ASAM) Criteria and/or other nationally recognized assessment and placement tools that reflect evidence-based clinical guidelines. As one of several requirements of the waiver, Oregon must establish residential treatment provider qualifications regarding types of services, hours of clinical care, and credentials of staff that meet program standards in *The ASAM Criteria*.

Per *The ASAM Criteria (Third Edition)*, "*The ASAM Criteria* text and *The ASAM Criteria* Software are clinical guides designed by the American Society of Addiction Medicine (ASAM) to improve assessment and outcomes-driven treatment and recovery services. It is also used to match patients to appropriate types and levels of care."

The Centers for Medicare & Medicaid Services (CMS) has approved Oregon to use *The ASAM Criteria* as our nationally recognized tool because it is the most widely used and comprehensive set of guidelines for SUD treatment, and because Oregon's provider network is already accustomed to working with *The ASAM Criteria*.

What does this mean for SUD treatment providers?

Treatment providers will be required to assess and make level of care placement decisions for each individual consistent with *The ASAM Criteria*. Providers can select to use *The ASAM Criteria* fillable PDF form, *The ASAM CONTINUUM* Software, **or** another assessment that evaluates treatment needs and makes level of care recommendations consistent with *the ASAM Criteria*. If utilizing an assessment other than the official ASAM© assessment, treatment providers will need to demonstrate that their assessment correctly includes *The ASAM Criteria* and can create a level of care determination.

As part of licensing and certification, SUD providers will be licensed or certified for each ASAM Level of Care they will provide as a condition of their certificate or license. Approval for each ASAM Level of Care will be documented through an application process and notation on the existing certificate or license. Note that this will **not** require additional, separate certificates or licenses per ASAM Level of Care.

How is this different from the use of ASAM Criteria already referenced in Oregon Administrative Rules?

Current rules require assessments and ASAM Levels of Care be “consistent with ASAM.” They do not currently require rendering services in a manner consistent with each ASAM Level of Care, as specified in the SUD waiver terms and conditions. The change means providers will need to:

- Demonstrate compliance to all aspects of *The ASAM Criteria* standards for each ASAM Level of Care rendered and
- Use an assessment that correctly includes *The ASAM Criteria* and can create an ASAM Level of Care determination. OHA will use ASAM or ASAM-based compliance tools to measure the level of adherence to *The ASAM Criteria*.

What ASAM Criteria assessment tools are available?

ASAM offers a free version, which is a fillable PDF. They also offer a software version, CONTINUUM, which can integrate with electronic health records for a fee. There is an additional, stand-alone software option.

Currently, these options do not include *The ASAM Criteria* for youth.

Providers can choose to use ASAM tools or other assessments if the assessment correctly includes *The ASAM Criteria* and can create an ASAM Level of Care determination.

When will this change go into effect?

Oregon must establish a requirement that providers assess treatment needs based on *The ASAM Criteria*, develop a process for compliance and review, and establish rules by April 7, 2023. OHA intends to offer an extended implementation period after the establishment of these rules for providers to come into compliance. The length of this implementation period will be 12 months after the rules go into effect. OHA will consider extensions to this implementation period on a case-by-case basis if providers experience hardship in coming into compliance.

What support will OHA offer providers?

- In July 2022, OHA increased the fee for service Medicaid rate paid for SUD assessment by 30 percent because of the impact of assessing in a manner consistent with *The ASAM Criteria* will have on the time needed to complete an assessment. This is in addition to the rate increase in January 2022 for select services due to historically low reimbursement.
- OHA will provide training on how to use *The ASAM Criteria* for any interested counselors, supervisors, or other staff who interact with the SUD continuum of care.
- OHA arranged virtual meetings with ASAM leaders so that providers can learn about the different versions of the ASAM tool and ask questions. These meetings were Tuesday, September 27, 2022, October 19, 2022, and November 17, 2022. Recordings of the meetings and slide presentations are posted on the waiver web page for those who were not able to attend.
- OHA will provide financial support/cost sharing for programs that serve Medicaid patients and prefer to use the software version of the ASAM assessment. This will be available in the 2023-2025 biennium.
- OHA will continue to host informational sessions for providers as the ASAM project progresses.
- OHA’s Licensing and Certification Unit will offer technical assistance sessions, once the rules are in place, to assist providers as they move into compliance with *The ASAM Criteria*.

How can providers be involved in the implementation plan for ASAM?

- Throughout November 2022, OHA hosted virtual focus groups with small groups of providers to discuss the aspects of implementation and provide suggestions and feedback. The goal was to foster collaboration and a shared understanding and purpose, ultimately leading to a successful implementation. Provider feedback and CMS requirements will guide OHA's implementation of the ASAM tools. Recordings of focus groups are posted on the waiver webpage under ASAM Listening Sessions for those who were not able to attend.
- OHA will continue to accept public feedback on the rules until they become final in March of 2023. You can ask questions and provide feedback by emailing sud.waiver@dhsosha.state.or.us.

Is OHA moving to require all providers to use a standardized assessment?

- Currently, mental health, substance use disorder, child and family, problem gambling, and integrated treatment providers use a variety of assessments. These vary depending on whether the provider uses an electronic health record, requirements of any accreditation they have, etc. All the different assessments must contain the content required by OAR, but they do not have to be standardized, and OHA is not moving to require all providers to use a standardized document for assessments.
- All SUD providers with COAs *will* need to demonstrate that their assessment correctly includes *The ASAM Criteria* and can create an ASAM Level of Care determination one year following the effective date of the OAR revisions. Treatment providers can select to use the proprietary assessments made available by ASAM (the free PDF or the electronic/software version) or demonstrate that their assessment includes *The ASAM Criteria* for diagnosing substance use disorders or co-occurring disorders and supports the appropriate ASAM Level of Care recommendation.

How will this tie into the new Co-occurring Disorders roll out which calls for an integrated assessment that addresses SUD, MH and Problem Gambling. Will we have to do yet another document that is "integrated" to be designated as a co-occurring program?

- The proprietary ASAM Criteria PDF or Software assessment can be used as a standalone assessment for diagnosing co-occurring disorders. Alternately, another assessment that includes all information needed to accurately diagnose co-occurring disorders can be used, in accordance with all applicable OAR.
- The OHA Integrated Co-Occurring Disorders (ICD) Team will provide training and will work with ICD providers to co-create an Integrated Assessment template that ICD programs can use at their option.
- The OHA Licensing and Certification Unit will be evaluating assessments for compliance with OAR.

How will ASAM integrate with MOTS and will OHA cover those costs?

- For SUD clients, MOTS captures two data points that relate to the ASAM: "Assessed Level of Care" and "Current Level of Care." These requirements will not change. Providers who use the Client Entry web portal should be familiar with these two data points. Providers who submit data by electronic means should be entering it into their EHR/EMR, and the submission process should pick up what MOTS needs. There should be no additional cost for this.

- When a provider chooses to integrate The ASAM CONTINUUM software assessment into their EHR, MOTS reporting pathways may be disrupted and need rerouting. ASAM has indicated that The CONTINUUM software is capable of communicating demographic data to MOTS and is currently in discussion with MOTS to address the flow of data.

Please email the 1115 SUD Waiver team at sud.waiver@dhsosha.state.or.us to ask questions, offer feedback and to request support.