

April 30, 2025

Dear County Partners,

Thank you again for selecting **CalMHSA as your representative for the certification program**. CalMHSA established a Peer Support Specialists Certification program on behalf of interested Behavioral Health Plans in 2021. We continue with our commitment to supporting your implementation of the Peer Support Benefit. Our continuous quality improvement model ensures the CalMHSA certification program is in full alignment with state requirements.

As the certifying entity, CalMHSA will implement all updates and requirements introduced in BHIN 25-010.

As a follow up to the release of [BHIN 25-010](#) dated April 4, 2025, we've outlined the key County Plan-specific changes and responsibilities introduced in this consolidated guidance. This BHIN covers the eleven previous BHINs and introduces important updates related to reporting, oversight, billing, and service delivery. We highly encourage behavioral health plans to review BHIN 25-010 in its entirety. We offer the following highlights:

### 1. Consolidation of Previous BHINs

- BHIN 25-010 replaces or supersedes guidance from eleven earlier BHINs into one document, streamlining expectations around certification, reporting, training, billing, and oversight.
- There are several BHINs that were not included or superseded by the BHIN. Please see the [DHCS website](#) for information.

### 2. Clarification on Parent, Caregiver, and Family Member Specialization

- BHIN 25-010 shifts language from “must” to “may” regarding peer services to parents/legal guardians of a member 17 years of age or younger. “*Medi-Cal Peer Support Specialists providing services to the parents/legal guardians of a member 17 years of age and younger **may** have a ‘Parent, Caregiver, and Family Member’ Medi-Cal Peer Support Specialist certification specialization*” (pg.7, footnote #7).
- Please note the use of “certification specialization” above. Specializations do not have a certification framework – individuals who complete training for working with specialized populations receive a certificate of completion from the training agency where training course was complete.

### 3. Updated Opt-In for County Behavioral Health Plan

- To provide Medi-Cal Peer Support Services, the County Plan must submit a letter to DHCS identifying the program(s) (SMHS, DMC, and/or DMC-ODS) for which they are opting in. Opt-in letter(s) are due by December 31 for implementation on the following July 1.

### 4. Reporting Timelines

- CalMHSA submits annual data reports to DHCS in accordance with timeliness expectations for those County Plans represented by CalMHSA.
- Please note, CalMHSA sends each represented County Plan their individual data sets annually at the time of submitting to DHCS.

### 5. EPSDT Compliance

- Regardless of opt-in status, County behavioral health plans must ensure that Peer Support Services are available to youth under 21 when medically necessary.
- CalMHSA recommends updating policies to ensure alignment with service delivery expectations (e.g., telehealth, external contracts).

## 6. Oversight of Certification Program

- Shifts responsibilities from DHCS to County Plans – investigations of complaints related to certification programs. This means any complaints made against CalMHSA as the certifying entity.
- County Plans are required to manage investigations, develop corrective action plans, and report to DHCS.
- DHCS may take additional actions against a certifying program, based on the County Plan's findings of the investigation.

## 7. Annual Reporting – Oversight Role

- County Plans are responsible for overseeing submission of detailed annual reports from certification programs, including:
  1. Demographic trends
  2. Complaints and actions
  3. Anticipated curriculum or program changes
- Please note, [CalMHSA certification program data dashboard](#) is available on our website.

## 8. Peer and Supervisor Qualifications

- Clarifies and updates language for supervisory requirements.
- Creates a legal and clinical boundary between peer supervision and clinical oversight.
- Clearly separates supervisory duties from clinical direction, specifying which Behavioral Health Professionals can direct services under State Plan roles and clearly aligned with clinical categories (LPHA, LMHP, etc.) Adds specific titles and ties to state plan roles for SMHS/DMC-DMC-ODS, offering regulatory clarity.

## 9. Certification Document

- The professional certification document is the document issued by CalMHSA once a peer had satisfied all certification requirements.
- The document requires the inclusion of all County behavioral health plans to be named on the document. This means CalMHSA will update the certification document to include the County Plan name – County Plans with a fully executed Participation Agreement with CalMHSA.
- While DHCS requires the date of birth to be included on the certificate, CalMHSA has raised concerns that including personally identifiable information such as date of birth may pose a privacy and data security risk.

## 10. Code of Ethics Updated

- Minor language revisions have been made to the DHCS Code of Ethics for Medi-Cal Peer Support Specialists.
- The revised Code of Ethics is included as [Enclosure 1](#) and available on the DHCS Peers webpage.

Please let us know if you need clarification on any of the above or have follow-up questions to [workforce@calmhsa.org](mailto:workforce@calmhsa.org)

Best regards,

Peer Support Specialist Certification Program