USE OF PHYSICIAN EXTENDERS IN DASA LICENSED/MEDICAID CERTIFIED SUBSTANCE USE DISORDER (SUD) TREATMENT ORGANIZATIONS

Administrative Rule, Part 2060, currently requires that each licensed substance use disorder treatment organization have a Medical Director which is defined as a physician who is licensed in good standing to practice medicine in all its branches. The Medical Director develops and authorizes all medical protocol for the organization and must conduct all physician reviews of medical screenings, authorize diagnosis, initial placement in care, initial treatment plan and any subsequent continued stay review when there is a change in the ASAM Dimension 2 (biomedical conditions and complications).

Since the enactment of Part 2060 in 1996, the use of Physician Extenders has become a standard practice in most primary care facilities. “Physician Extenders” is a collective term that includes nurse practitioners and physician assistants. They are also referred to as “mid-level practitioners” and in Illinois must have licensure in good standing under the authority of the Illinois Nursing and Advanced Practice Nursing Act [225 ILCS 65]. In accordance with this Act, Physician Extenders are allowed to conduct various medical services under the supervision of a physician and this has been standard medical practice for many years.

Historically, licensed substance use disorder providers have experienced difficulty obtaining physicians with any addiction training to provide weekly, and sometimes daily, assistance with meeting the current requirements in Part 2060, particularly in rural areas. The Division of Alcoholism and Substance Abuse (DASA) compliance reviews have found that oversight is often not based on a thorough review of the assessment and its correlation to the diagnosis and placement in care. Providers may find Physician Extenders to be less expensive and more readily recruited; have more availability for ongoing training; and be able to devote more oversight to the determination of medical necessity and the appropriate associated levels of care. Therefore, effective, October 1, 2017, DASA will allow the use of Physician Extenders in the substance use disorder treatment system as follows:

1. Under the supervision of the Medical Director and in accordance with all organization and Medical protocol authorized by the Medical Director, Physician Extenders can conduct physicals, physician review of the medical screening to determine the immediate need for a physical or psychiatric exam, confirm the initial diagnosis, treatment plan and placement in a level of care and any continuing stay review when there is a significant change in ASAM Dimension 2 (biomedical conditions and complications). These confirmations and reviews can only be authorized after a review of the assessment to confirm the diagnosis and medical necessity for the recommended level of care and to ensure that the treatment plan or continuing stay review addresses currently identified problem areas. The signatory document for these authorizations must attest that the assessment and supporting documentation have been reviewed.

2. Physician Extenders can also be used for medication monitoring under protocol established by the Medical Director.

3. To begin using Physician Extenders for the above stated purposes, each organization must request an exception in accordance with the process identified in Part 2060.303. A DASA Schedule E (attached to this Smart Alert) must be completed for each Physician Extender and be included with the exception request.

4. PLEASE NOTE: In organizations licensed to use methadone as an adjunct to treatment, Physician Extenders CANNOT order medication dosages and pickup codes for methadone without a specific waiver from the Center for Substance Abuse Treatment (CSAT) which must be requested by DASA on behalf of each organization. A separate exception request must be submitted to DASA for this purpose.

Questions regarding the use of Physician Extenders or the exception process can be directed to the DASA Help Desk at DoIT.DASAHELP@ILLINOIS.GOV or by emailing Norma.Seibert@illinois.gov. Specific questions regarding the exception for Methadone dosages and pickup codes should be emailed to Richard.Weisskopf@illinois.gov.

Effective, October 1, 2017, the Division of Alcoholism and Substance (DASA) will allow the use of Physician Extenders in the substance use disorder treatment system in accordance with the criteria specified in this Smart Alert.