

FISCAL YEAR (FY) 2015/2016 ANNUAL REVIEW OF CONSOLIDATED SPECIALTY MENTAL  
HEALTH SERVICES AND OTHER FUNDED SERVICES  
ALPINE COUNTY MENTAL HEALTH PLAN REVIEW  
May 9, 2016  
FINAL FINDINGS REPORT

**Section K, “Chart Review – Non-Hospital Services**

The medical records of five (5) adult and five (5) child/adolescent Medi-Cal specialty mental health beneficiaries were reviewed for compliance with state and federal regulations; adherence to the terms of the contract between the Alpine County Mental Health Plan (MHP) and the California Department of Health Care Services (DHCS), and for consistency with the MHP’s own documentation standards and policies and procedures regarding medical records documentation. The process included a review of 175 claims submitted for the months of January through June of 2015.

**Contents**

<i>Medical Necessity</i> .....	2
<i>Assessment</i> .....	3
<i>Medication Consent</i> .....	6
<i>Client Plans</i> .....	7
<i>Progress Notes</i> .....	8

**Medical Necessity**

PROTOCOL REQUIREMENTS	
1.	Does the beneficiary meet all three (3) of the following medical necessity criteria for reimbursement (1a, 1b, and 1c. below)?
1a.	The beneficiary has a current ICD diagnosis which is included for non-hospital SMHS in accordance with the MHP contract?
1b.	The beneficiary, as a result of a mental disorder or emotional disturbance listed in 1a, must have at least one (1) of the following criteria (1-4 below): <ol style="list-style-type: none"> <li>1) A significant impairment in an important area of life functioning.</li> <li>2) A probability of significant deterioration in an important area of life functioning.</li> <li>3) A probability that the child will not progress developmentally as individually appropriate.</li> <li>4) For full-scope MC beneficiaries under the age of 21 years, a condition as a result of the mental disorder or emotional disturbance that SMHS can correct or ameliorate.</li> </ol>
1c.	Do the proposed and actual intervention(s) meet the intervention criteria listed below: <ol style="list-style-type: none"> <li>1) The focus of the proposed and actual intervention(s) is to address the condition identified in No. 1b. (1-3) above, or for full-scope MC beneficiaries under the age of 21 years, a condition as a result of the mental disorder or emotional disturbance that SMHS can correct or ameliorate per No. 1b(4).</li> </ol>
	<ol style="list-style-type: none"> <li>2) The expectation is that the proposed and actual intervention(s) will do at least one (1) of the following (A, B, C, or D):                             <ol style="list-style-type: none"> <li>A. Significantly diminish the impairment.</li> <li>B. Prevent significant deterioration in an important area of life functioning.</li> <li>C. Allow the child to progress developmentally as individually appropriate.</li> <li>D. For full-scope MC beneficiaries under the age of 21 years, correct or ameliorate the condition.</li> </ol> </li> </ol>
1d.	The condition would not be responsive to physical health care based treatment.
	<ul style="list-style-type: none"> <li>• CCR, title 9, chapter 11, section 1830.205 (b)(c)</li> <li>• CCR, title 9, chapter 11, section 1830.210</li> <li>• CCR, title 9, chapter 11, section 1810.345(c)</li> <li>• CCR, title 9, chapter 11, section 1840.112(b)(1-4)</li> </ul>
	<ul style="list-style-type: none"> <li>• CCR, title 9, chapter 11, section 1840.314(d)</li> <li>• CCR, title 22, chapter 3, section 51303(a)</li> <li>• Credentialing Boards for MH Disciplines</li> </ul>

**Reasons for Recoupment (RR): Refer to the enclosed Recoupment Summary for additional details concerning disallowances**

- RR3. Documentation in the medical record does not establish that the focus of the proposed intervention is to address the functional impairment identified in CCR, title 9, chapter 11, section 1830.205(b)(2)
- RR4. Documentation in the medical record does not establish the expectation that the proposed intervention will do, at least, one of the following:
  - a) Significantly diminish the impairment;
  - b) Prevent significant deterioration in an important area of life functioning;
  - c) Allow the child to progress developmentally as individually appropriate; or
  - d) For full-scope Medi-Cal beneficiaries under the age of 21 years, correct or ameliorate the condition.

**FINDING 1c-1:**

The medical record associated with the following Line number did not meet the medical necessity criteria since the focus of the proposed interventions did not address the mental health condition as specified in the CCR, title 9, chapter 11, section 1830.205(b)(3)(A):

- 1. RR3, refer to Recoupment Summary for details

**PLAN OF CORRECTION 1c-1:**

The MHP shall submit a POC that indicates how the MHP will ensure that interventions are focused on a significant functional impairment that is directly related to the mental health condition as specified in CCR, title 9, chapter 11, section 1830.205(b)(3)(A).

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**FINDING 1c-2:**

The medical record associated with the following Line numbers did not meet the medical necessity criteria since there was no expectation that the documented intervention would meet the intervention criteria as specified in the CCR, title 9, chapter 11, section 1830.205(b)(3)(B)(1-4):

- 2. RR4, refer to Recoupment Summary for details

**PLAN OF CORRECTION 1c-2:**

The MHP shall submit a POC that indicates how the MHP will ensure that the interventions provided meet the intervention criteria specified in CCR, title 9, chapter 11, section 1830.205(b)(3)(B)(1-4).

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**Assessment** *(Findings in this area do not result in disallowances. Plan of Correction only.)*

<b>PROTOCOL REQUIREMENTS</b>	
2.	Regarding the Assessment, are the following conditions met:
2a.	1) Has the Assessment been completed in accordance with the MHP's established written documentation standards for timeliness?
	2) Has the Assessment been completed in accordance with the MHP's established written documentation standards for frequency?
<ul style="list-style-type: none"> <li>• CCR, title 9, chapter 11, section 1810.204</li> <li>• CCR, title 9, chapter 11, section 1840.112(b)(1-4)</li> <li>• CCR, title 9, chapter 11, section 1840.314(d)(e)</li> <li>• CCR, title 9, chapter 4, section 851- Lanterman-Petris Act</li> <li>• MHP Contract, Exhibit A, Attachment I</li> </ul>	

**FINDINGS 2a:**

Assessments were not completed in accordance with regulatory and contractual requirements, specifically:

<sup>1</sup> Line number removed for confidentiality

<sup>2</sup> Line number removed for confidentiality

One or more assessments were not completed within the timeliness and frequency requirements specified in the MHP’s written documentation standards. The following are specific findings from the chart sample:

- <sup>3</sup>: There were no updated assessments found in the medical record. *During the review, MHP staff were given the opportunity to locate the missing assessments but could not locate the documents in the medical record.*
- <sup>4</sup>: The updated assessments were completed late.

**PLAN OF CORRECTION 2a:**

The MHP shall submit a POC that indicates how the MHP will ensure that assessments are completed in accordance with the timeliness and frequency requirements specified in the MHP’s written documentation standards.

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<b>PROTOCOL REQUIREMENTS</b>	
2b.	Do the Assessments include the areas specified in the MHP Contract with the Department?
	1) Presenting Problem. The beneficiary’s chief complaint, history of presenting problem(s) including current level of functioning, relevant family history and current family information;
	2) Relevant conditions and psychosocial factors affecting the beneficiary’s physical health and mental health including, as applicable; living situation, daily activities, social support, cultural and linguistic factors, and history of trauma or exposure to trauma;
	3) Mental Health History. Previous treatment, including providers, therapeutic modality (e.g., medications, psychosocial treatments) and response, and inpatient admissions. If possible, include information from other sources of clinical data such as previous mental health records and relevant psychological testing or consultation reports;
	4) Medical History. Relevant physical health conditions reported by the beneficiary or a significant support person. Include name and address of current source of medical treatment. For children and adolescents the history must include prenatal and perinatal events and relevant/significant developmental history. If possible, include other medical information from medical records or relevant consultation reports
	5) Medications. Information about medications the beneficiary has received, or is receiving, to treat mental health and medical conditions, including duration of medical treatment. The assessment must include documentation of the absence or presence of allergies or adverse reactions to medications and documentation of an informed consent for medications;
	6) Substance Exposure/Substance Use. Past and present use of tobacco, alcohol, caffeine, CAM (complementary and alternative medications) and over-the-counter drugs, and illicit drugs;
	7) Client Strengths. Documentation of the beneficiary’s strengths in achieving client plan goals related to the beneficiary’s mental health needs and functional impairments as a result of the mental health diagnosis;
	8) Risks. Situations that present a risk to the beneficiary and/or others, including past or current trauma;
	9) A mental status examination;

<sup>3</sup> Line number removed for confidentiality

<sup>4</sup> Line number removed for confidentiality

10) A Complete Diagnosis; A diagnosis from the current ICD-code must be documented, consistent with the presenting problems, history, mental status examination and/or other clinical data; including any current medical diagnoses.	
<ul style="list-style-type: none"> <li>CCR, title 9, chapter 11, section 1810.204</li> <li>CCR, title 9, chapter 11, section 1840.112(b)(1-4)</li> <li>CCR, title 9, chapter 11, section 1840.314(d)(e)</li> </ul>	<ul style="list-style-type: none"> <li>CCR, title 9, chapter 4, section 851- Lanterman-Petris Act</li> <li>MHP Contract, Exhibit A, Attachment I</li> </ul>

**FINDING 2b:**

One or more of the assessments reviewed did not include all of the elements specified in the MHP Contract with the Department. The following required elements were incomplete or missing:

- 1) Medical History: <sup>5</sup>.
- 2) Medications: <sup>6</sup>.
- 3) Substance Exposure/Substance Use: <sup>7</sup>.
- 4) Client Strengths: <sup>8</sup>.
- 5) Risks: <sup>9</sup>.
- 6) A full DSM diagnosis or current ICD code: <sup>10</sup>.

**PLAN OF CORRECTION 2b:**

The MHP shall submit a POC that indicates how the MHP will ensure that every assessment contains all of the required elements specified in the MHP Contract with the Department.

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PROTOCOL REQUIREMENTS	
2c.	Does the assessment include:
	1) The date of service?
	2) The signature of the person providing the service (or electronic equivalent); the person's type of professional degree, and licensure or job title?
	3) The date the documentation was entered in the medical record?
<ul style="list-style-type: none"> <li>CCR, title 9, chapter 11, section 1810.204</li> <li>CCR, title 9, chapter 11, section 1840.112(b)(1-4)</li> <li>CCR, title 9, chapter 11, section 1840.314(d)(e)</li> </ul>	<ul style="list-style-type: none"> <li>CCR, title 9, chapter 4, section 851- Lanterman-Petris Act</li> <li>MHP Contract, Exhibit A, Attachment I</li> </ul>

**FINDING 2c:**

The Assessment did not include:

- 1) Signature of the person providing the service (or electronic equivalent) that includes the person's professional degree, licensure, or job title:
  - <sup>11</sup>.

<sup>5</sup> Line number removed for confidentiality

<sup>6</sup> Line number removed for confidentiality

<sup>7</sup> Line number removed for confidentiality

<sup>8</sup> Line number removed for confidentiality

<sup>9</sup> Line number removed for confidentiality

<sup>10</sup> Line number removed for confidentiality

<sup>11</sup> Line number removed for confidentiality

**PLAN OF CORRECTION 2c:**

The MHP shall submit a POC that indicates how the MHP will ensure that all documentation includes the signature or (electronic equivalent) with the professional degree, licensure or title of the person providing the service.

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**Medication Consent** (Findings in this area do not result in disallowances. Plan of Correction only.)

PROTOCOL REQUIREMENTS	
3b.	Does the medication consent for psychiatric medications include the following required elements:
	1) The reasons for taking such medications?
	2) Reasonable alternative treatments available, if any?
	3) Type of medication?
	4) Range of frequency (of administration)?
	5) Dosage?
	6) Method of administration?
	7) Duration of taking the medication?
	8) Probable side effects?
	9) Possible side effects if taken longer than 3 months?
	10) Consent once given may be withdrawn at any time?
<ul style="list-style-type: none"> <li>CCR, title 9, chapter 11, section 1810.204</li> <li>CCR, title 9, chapter 11, section 1840.112(b)(1-4)</li> <li>CCR, title 9, chapter 11, section 1840.314(d)(e)</li> </ul>	<ul style="list-style-type: none"> <li>CCR, title 9, chapter 4, section 851- Lanterman-Petris Act</li> <li>MHP Contract, Exhibit A, Attachment I</li> </ul>

**FINDING 3b:**

Written medication consents did not contain all of the required elements specified in the MHP Contract with the Department. The following required elements were not documented on the medication consent forms found in the beneficiary’s medical record:

- 1) Reasonable alternative treatments available, if any: <sup>12</sup>.
- 2) Type of medication: <sup>13</sup>.
- 3) Range of frequency: <sup>14</sup>.
- 4) Dosage: <sup>15</sup>.
- 5) Method of administration (oral or injection): <sup>16</sup>.
- 6) Duration of taking each medication: <sup>17</sup>.
- 7) Possible side effects if taken longer than 3 months: <sup>18</sup>.
- 10) Consent once given may be withdrawn at any time: <sup>19</sup>.

<sup>12</sup> Line number removed for confidentiality  
<sup>13</sup> Line number removed for confidentiality  
<sup>14</sup> Line number removed for confidentiality  
<sup>15</sup> Line number removed for confidentiality  
<sup>16</sup> Line number removed for confidentiality  
<sup>17</sup> Line number removed for confidentiality  
<sup>18</sup> Line number removed for confidentiality  
<sup>19</sup> Line number removed for confidentiality

**PLAN OF CORRECTION 3b:**

The MHP shall submit a POC that indicates how the MHP will ensure that every medication consent includes documentation of all of the required elements specified in the MHP Contract with the Department.

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*Client Plans*

PROTOCOL REQUIREMENTS	
4a	2) Has the client plan been updated at least annually and/or when there are significant changes in the beneficiary's condition?
<ul style="list-style-type: none"> <li>• CCR, title 9, chapter 11, section 1810.205.2</li> <li>• CCR, title 9, chapter 11, section 1810.254</li> <li>• CCR, title 9, chapter 11, section 1810.440(c)(1)(2)</li> <li>• CCR, title 9, chapter 11, section 1840.112(b)(2-5)</li> <li>• CCR, title 9, chapter 11, section 1840.314(d)(e)</li> <li>• DMH Letter 02-01, Enclosure A</li> </ul>	<ul style="list-style-type: none"> <li>• WIC, section 5751.2</li> <li>• MHP Contract, Exhibit A, Attachment I</li> <li>• CCR, title 16, Section 1820.5</li> <li>• California Business and Profession Code, Section 4999.20</li> </ul>

**FINDING 4a-2:**

The client plan was not updated at least annually or when there was a significant change in the beneficiary's condition (as required in the MHP Contract with the Department and/or as specified in the MHP's documentation standards):

- <sup>20</sup> The prior client plan was late per the MHP's written documentation standards. However, this occurred outside the audit review period.

*The MHP should review all services and claims during which there was no client plan in effect and disallow those claims as required.*

**PLAN OF CORRECTION 4a-2:**

The MHP shall submit a POC that indicates how the MHP will:

- 1) Ensure that client plans are completed at least on an annual basis as required in the MHP Contract with the Department, and within the timelines and frequency specified in the MHP's written documentation standards.
- 2) Provide evidence that all services identified during the audit that were claimed outside of the audit review period for which no client plan was in effect are disallowed.

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PROTOCOL REQUIREMENTS	
4b.	Does the client plan include the items specified in the MHP Contract with the Department?  1) Specific, observable, and/or specific quantifiable goals/treatment objectives related to the beneficiary's mental health needs and functional impairments as a result of the mental health diagnosis.

<sup>20</sup> Line number removed for confidentiality

2) The proposed type(s) of intervention/modality including a detailed description of the intervention to be provided.
3) The proposed frequency of intervention(s).
4) The proposed duration of intervention(s).
5) Interventions that focus and address the identified functional impairments as a result of the mental disorder or emotional disturbance.
6) Interventions are consistent with client plan goal(s)/treatment objective(s).
7) Be consistent with the qualifying diagnoses.
<ul style="list-style-type: none"> <li>• CCR, title 9, chapter 11, section 1810.205.2</li> <li>• CCR, title 9, chapter 11, section 1810.254</li> <li>• CCR, title 9, chapter 11, section 1810.440(c)(1)(2)</li> <li>• CCR, title 9, chapter 11, section 1840.112(b)(2-5)</li> <li>• CCR, title 9, chapter 11, section 1840.314(d)(e)</li> <li>• DMH Letter 02-01, Enclosure A</li> </ul>
<ul style="list-style-type: none"> <li>• WIC, section 5751.2</li> <li>• MHP Contract, Exhibit A, Attachment I</li> <li>• CCR, title 16, Section 1820.5</li> <li>• California Business and Profession Code, Section 4999.20</li> </ul>

**FINDING 4b:**

The following Line numbers had client plans that did not include all of the items specified in the MHP Contract with the Department:

**4b-2)** One or more of the proposed interventions did not include a detailed description. Instead, only a “type” or “category” of intervention was recorded on the client plan (e.g. “Medication Support Services,” “Targeted Case Management,” “Mental Health Services,” etc.). <sup>21</sup>.

**4b-3)** One or more of the proposed interventions did not indicate an expected frequency. <sup>22</sup>.

**PLAN OF CORRECTION 4b:**

The MHP shall submit a POC that indicates how the MHP will ensure that:

- 1) All mental health interventions/modalities proposed on client plans include a detailed description of the interventions to be provided and do not just identify a type or modality of service (e.g. “therapy”, “medication”, “case management”, etc.).
- 2) All mental health interventions proposed on client plans indicate both an expected frequency and duration for each intervention.

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**Progress Notes**

PROTOCOL REQUIREMENTS	
5a.	Do the progress notes document the following: <ol style="list-style-type: none"> <li>1) Timely documentation (as determined by the MHP) of relevant aspects of client care, including documentation of medical necessity?</li> <li>2) Documentation of beneficiary encounters, including relevant clinical decisions, when decisions are made, alternative approaches for future interventions?</li> </ol>

<sup>21</sup> Line number removed for confidentiality

<sup>22</sup> Line number removed for confidentiality



3) Interventions applied, beneficiary’s response to the interventions, and the location of the interventions?	
4) The date the services were provided?	
2) Documentation of referrals to community resources and other agencies, when appropriate?	
3) Documentation of follow-up care or, as appropriate, a discharge summary?	
4) The amount of time taken to provide services?	
5) The signature of the person providing the service (or electronic equivalent); the person’s type of professional degree, and licensure or job title?	
<ul style="list-style-type: none"> <li>• CCR, title 9, chapter 11, section 1810.254</li> <li>• CCR, title 9, chapter 11, section 1810.440(c)</li> <li>• CCR, title 9, chapter 11, section 1840.112(b)(2-6)</li> <li>• CCR, title 9, chapter 11, section 1840.314</li> </ul>	<ul style="list-style-type: none"> <li>• CCR, title 9, chapter 11, sections 1840.316 - 1840.322</li> <li>• CCR, title 22, chapter 3, section 51458.1</li> <li>• CCR, title 22, chapter 3, section 51470</li> <li>• MHP Contract, Exhibit A, Attachment I</li> </ul>

**FINDING 5a:**

Progress notes were not completed in accordance with regulatory and contractual requirements and/or with the MHP’s own written documentation standards:

- One or more progress note was not completed within the timeliness and frequency standards in accordance with regulatory and contractual requirements.
- Progress notes did not document the following:

**5a-1)** <sup>23</sup>: Timely documentation of relevant aspects of beneficiary care as specified by the MHP’s documentation standards (i.e., progress notes completed late based on the MHP’s written documentation standards in effect during the audit period).

**PLAN OF CORRECTION:**

The MHP shall submit a POC that indicates how the MHP will ensure that progress notes document:

**5a-1)** Timely completion by the person providing the service and relevant aspects of client care, as specified in the MHP Contract with the Department and the MHP’s written documentation standards.

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<sup>23</sup> Line number removed for confidentiality