

Solano MHP Plan of Correction to DHCS 17-18 Triennial System Review and Chart Audit

INTRODUCTION

Based on the Department of Health Care Services (DHCS) Chart Review for Fiscal Year 17/18, the Solano County Mental Health Division, representing the Solano Mental Health Plan (MHP) will take the below four (4) over-arching system-wide actions as part of its plan of correction. The Solano MHP will also take specific actions related to each finding as noted throughout this plan of correction.

In addition to the steps mentioned throughout this plan of correction, the Solano MHP Quality Improvement (QI) team will require each individual provider who had findings and/or disallowances in their chart(s) to review and submit an individualized plan of correction. The QI team will review all submitted plans of corrections to ensure appropriateness and will follow up with providers to monitor completion.

¹Solano MHP QI Information Notice:

Solano MHP issues a “**QI Information Notice**” for distribution to all County owned-and-operated as well as contracted organizational providers to highlight new or updated processes, including documentation, claiming and other Mental Health Plan requirements. The QI Information Notices are sent to all providers, and are additionally reviewed in a monthly QI Liaison’s Meeting. Notices are also reviewed during monthly MHP Clerical Staff meeting, and in quarterly Quality Improvement Committee (QIC) meetings.

QI Information Notices will be developed and distributed to all MH providers highlighting keys areas found to be out of compliance in the Chart Review. The QI Information Notices will serve as a reminder and/or clarification of existing policies and procedures as well as notification of new policies based on the DHCS Triennial System Review and Chart Audit findings.

²Infrastructure:

When new regulations necessitate new processes or areas of improvement are made known to the MHP via external review, the MHP QI team works with MHP programs to build new infrastructure (e.g. documents, forms, data collection processes, etc.) so new and improved processes can take shape. New and/or revised infrastructure is not required in every case of improvement, but often is and therefore this element is part of the Plan of Correction toolbox. As appropriate, relevant Policies and Procedures will be updated and posted online, and the system will receive notice that it was updated. This will be a collaborative process where the P&P is informed by regulations and existing operations in order to manage and fully understand the impact on actual service delivery.

³Training:

The Solano MHP QI team offers monthly “Documentation Training” to all MHP providers. The QI Team also offers Annual “Documentation Training” as a required training for all MH providers. Additionally, the QI Team develops documentation and system process training on an ad hoc basis. As the MHP implements improvements based upon the DHCS Triennial System Review and Chart Audit findings, these changes will be embedded into the ongoing training curriculum and additional focused trainings will be offered if/when areas of continued non-compliance are identified.

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⁴Documentation/Process Reviews:

The Solano MHP QI Team currently reviews a minimum of two individual provider charts per organization annually using the MHP QI Chart Review Tools. For the purposes of this Plan of Correction, and in conjunction with these annual reviews, the QI Team will target specific Chart Review finding items identified in the DHCS Triennial Chart Review to incorporate into the audit process. These additional audit items will only be incorporate 4-6 months after QI Information Notice dissemination, infrastructure building and all training associated with this plan have been facilitated so that providers have an opportunity to amend any practices that don't fully meet expectations.

Additionally, Solano MHP will engage in additional process reviews specific to certain Plan of Correction items that warrant an additional process review (see specific POC items below).

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SYSTEM REVIEW FINDINGS

Finding B2b8 – MHP provider directory did not indicate whether the providers have completed cultural competence training. The provider list did not include information on whether providers have completed this training and the MHP does not track all providers for cultural competence training completion.		
Plan of Correction – Solano will ensure that all providers within Solano’s MHP provide an updated monthly status of Cultural Competence training for the provider directory.		
Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	07/30/18	Solano will issue a QI Information Notice to MHP to officially direct providers in this activity.
MHP Infrastructure Building²	08/30/18	All organizational providers will post updated lists on their website or will be included directly in the MHP Provider Directory, including updated Cultural Competence training for providers. Fee-for-Service providers will submit updates to County to be included on County MHP Directory. Solano MHP QI will monitor compliance on a quarterly basis. Solano MHP Policy will be updated as needed.
Training³	07/30/18	Provide Webinar to review process w/ County & Contractor providers.
Documentation/Process Reviews⁴	Monthly	Will ensure that every program posts updated lists monthly or have updated providers added directly to the MHP Provider Directory monthly.

Finding B2b9 - MHP provider directory did not indicate whether provider offices/facilities are ADA compliant. The provider list does not show that all providers are ADA compliant and the MHP indicated that some providers are and some are not ADA compliant.		
Plan of Correction – Solano will ensure that providers indicate an updated ADA compliance status on provider list, on a monthly basis.		
Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	07/30/18	Solano will issue a QI Information Notice to MHP to officially direct providers in this activity.
MHP Infrastructure Building²	07/30/18	All organizational providers will post updated lists on their website, including updated ADA

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		compliance status for providers. Fee-for-Service providers will submit updates to County to be included on County MHP Directory. Solano MHP QI will monitor compliance on a quarterly basis.
Training³	07/30/18	Provide Webinar to review process w/ County & Contractor providers
Documentation/Process Reviews⁴	Monthly	Will ensure that every program posts updated lists monthly.

Finding B9a2 – The MHP did not provide information to beneficiaries about how to access specialty mental health services, including specialty mental health services required to assess whether medical necessity criteria are met in one out of five DHCS test calls (80% compliance).		
Plan of Correction – MHP will ensure that staff who answer Solano’s 24/7 toll-free Access line provide information about how to access specialty mental health services.		
Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	07/30/18	Solano will review existing protocols/Policy AAA220 Access to Services, and make revisions if necessary to improve process.
MHP Infrastructure Building²	07/30/18	Solano’s Access Supervisor will create and/or revise Access call scripts to help ensure consistent messaging to callers, and improve compliance with this regulation.
Training³	07/30/18	Solano’s Access Supervisor will provide additional training to business hours and after hours staff, and will train staff how to utilize the Access call script.
Documentation/Process Reviews⁴	Monthly	Solano QI will continue monthly test calls, and Access Supervisor will do random checks to ensure staff are using script.

Finding B9a4 - The MHP did not provide information to beneficiaries about how to use the beneficiary problem resolution and fair hearing process in one out of two DHCS test calls (50% compliance).		
Plan of Correction - MHP will ensure that staff who answer Solano’s 24/7 toll-free Access line provide information about how to access Solano’s beneficiary problem resolution process.		
Description of correction actions, including milestones:	Timeline for implementation and/or completion of	Proposed (or actual) evidence of correction that will be submitted to DHCS:

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	correction actions:	
Solano MHP QI Information Notice¹	07/30/18	Solano will review existing protocols/Policy ADM141 Beneficiary Problem Resolutions, and make revisions if necessary to improve process.
MHP Infrastructure Building²	07/30/18	Solano's Access Supervisor will create and/or revise Access call scripts to help ensure consistent messaging to callers, and improve compliance with this regulation.
Training³	07/30/18	Solano's Access Supervisor will provide additional training to business hours and after hours staff, and will train staff how to utilize the Access call script.
Documentation/Process Reviews⁴	Monthly	Solano QI will continue monthly test calls, and Access Supervisor will do random checks to ensure staff are using script.

Finding B13a – The MHP did not furnish evidence it has a plan for annual cultural competence training to ensure the provision of culturally competent services. Documentation lacked sufficient evidence of compliance with training requirements, specifically documents attempting to ensure that administrative/management staff and persons providing SMHS employed by or contracted with the MHP were trained. Additionally, the MHP did not have a process to ensure interpreters are trained and monitored for language competence.

Plan of Correction – Solano MHP must develop a plan for, and provide evidence of, cultural competency training for administrative and management staff as well as persons providing SMHS employed by or contracting with the MHP.

Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	08/30/18	Solano will issue a QI Information Notice to MHP to officially direct providers in this activity.
MHP Infrastructure Building²	08/30/18	Solano will create a tracking process of all providers who have received Cultural Competence (CC) training within the current Fiscal Year: <ul style="list-style-type: none"> • Contracted Organizational providers will post updated status of provider CC training on their website • Fee-for-Service providers will submit updates to County to be included on County MHP Directory. • County staff will be tracked internally, in a QI spreadsheet.

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Training³	08/30/18	Provide Webinar to review process w/ County & Contractor providers
Documentation/Process Reviews⁴	Monthly	Will ensure that every program posts updated status of provider CC training monthly.

Finding B13b – The MHP did not show sufficient evidence of the implementation of training programs to improve the cultural competence skills of staff and contract providers.

Plan of Correction – The MHP must develop a process to ensure interpreters are trained and monitored for language competence.

Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	06/30/19	Solano will issue a QI Information Notice to MHP to officially direct providers in this activity.
MHP Infrastructure Building²	06/30/19	Human Resources policies currently subject an employee to a written and verbal exam but does not include a mechanism for ongoing language competence. Solano will work with Solano HR and Unions to develop a process beyond the exam that includes training to act as Interpreters and to monitor, at identified intervals, ongoing language competence.
Training³	06/30/19	Provide in-person training or webinar to review process w/ County & Contractor providers
Documentation/Process Reviews⁴	Quarterly	Will ensure that every program submits updated lists of providers who provide interpretation and who have received interpreter training to QI.

Finding D2 – It was determined that the MHP documentation lacked sufficient evidence of compliance with requirements, specifically, two grievances reviewed by DHCS were not logged within one working day.

Plan of Correction – MHP will demonstrate that it maintains a grievance, appeal and expedited appeal log that records grievances, appeals, and expedited appeals within one work day of the date of receipt.

Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	N/A	None needed. This is already covered by policy ADM141 Beneficiary Problem Resolution – Grievances.

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MHP Infrastructure Building²	08/30/18 – Monthly thereafter	Create a reporting structure for Problem Resolution Coordinator to QI Supervisor on a weekly basis of timeliness of documenting all Grievances, Appeals and Expedited Appeals into the Problem Resolution Log.
Training³	08/30/18	Problem Resolution Coordinator and back up will be trained around the process and importance of timely logging of Grievances, Appeals and Expedited Appeals into the Problem Resolution Log.
Documentation/Process Reviews⁴	Weekly	Reporting status to QI Supervisor

Finding G2b – The MHP did not show sufficient evidence that it's ongoing monitoring system of county-owned and operated and contracted organizational providers is effective, in that one provider out (1) of 45 providers was overdue for certification at the time of review.

Plan of Correction – Solano MHP will ensure its monitoring system protocols and procedures are effective.

Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	N/A	None needed. This is already covered by MHP policy QI617 Short Doyle Medi-Cal Certification-Recertification Process.
MHP Infrastructure Building²	08/30/18 – Monthly thereafter	Create a reporting structure for Certification Coordinator to QI Supervisor on a monthly basis of upcoming, completed and/or overdue certifications.
Training³	08/30/18	Certification Coordinator and back up will be trained around the process and importance of timely certification and recertification of programs.
Documentation/Process Reviews⁴	Monthly	Reporting status to QI Supervisor

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SYSTEM REVIEW – SURVEY ONLY FINDINGS

Survey Item A6 – Regarding TFC service model:		
<ol style="list-style-type: none"> 1. Does the MHP have a mechanism in place for providing medically necessary TFC services? 2. Has the MHP taken steps to ensure that TFC will be available to children/youth who require this service, either through contracting with a TFC agency or establishing a county-owned and operated TFC agency? 		
Survey Finding – DHCS reviewed Solano County Implementation Plan, FY 16-17		
Suggested Actions – DHCS recommends the MHP implement follow through actions with providers to establish TFC services.		
Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice/Notice to the Public	12/31/18	The MHP plans to issue a Request for Proposals (RFP) for TFC in 2018. We hope to identify one or more FFAs that can provide TFC services, and will contract with them as they are Medi-Cal certified.
MHP Infrastructure Building²	02/28/19	MHP QI will work with RFP awarded TFC agencies to create Policy, protocols, and documentation needed for the successful implementation of TFC operations.
Training³	03/31/19	<p>MHP's CCR Liaison attended a meeting on 3/19/18 of all of the Foster Family Agencies (FFA) that Solano Child Welfare Services currently places with. The FFAs were asked if any of them had potential TFC parents identified or were starting to train TFC parents, and only one out of over 20 agencies said they had begun to prepare to be TFC agencies.</p> <p>Training: TFC Agencies will follow the same training plan as any EPSDT contractor in the MHP, and be held to the training standards listed in the state's TFC Service Model and Parent Qualifications documents. In addition, because TFC is not a stand-alone service, county and contractor providers will receive training about TFC services.</p>
Documentation/Process Reviews⁴	Annual	Documentation: Solano MHP has already updated its Documentation Manual to add the TFC billing code using the DHCS & CDSS Medi-Cal Manual for ICC, IHBS, and TFC Services for Medi-Cal Beneficiaries (Third Edition, January 2018). Contracted TFC

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		Agencies will be subject to the same documentation standards and auditing procedures as all contractors within the MHP.
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Survey Item A7 – Regarding Continuum of Care Reform:		
1. Does the MHP maintain an appropriate network of Short Term Residential Therapeutic Programs (STRTPs) for children/youth who meet criteria?		
Survey Finding – There was no evidence that the MHP maintains an appropriate network of STRTPs.		
Suggested Actions – DHCS recommends the MHP continue working towards developing and maintaining an appropriate network of STRTPs (Continue to work with three local group homes and follow up with Contra Costa County re: placement).		
Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	N/A	N/A
MHP Infrastructure Building²	N/A	Review Policies to ensure updated with most recent information from DHCS
Training³	N/A	N/A
Documentation/Process Reviews⁴	N/A	N/A

- There are currently only 3 group homes located within Solano County, and none of them are currently Medi-Cal certified to provide Specialty Mental Health Services (SMHS). Solano MHP is working closely with Solano CWS to monitor the status of those three group homes in terms of their plans to convert to become licensed STRTPs. If they do become licensed and also become Medi-Cal certified, Solano MHP will work with those STRTPs and identify the viability of contracting with them.
- Solano MHP also has contracts with over 15 group homes that are located outside of Solano County and have had Solano CWS and/or Probation clients placed there. Based on the CDSS list of Licensed STRTPs posted on their website and dated 4/23/18, only one of the group homes we have contracts with has converted to STRTP. Again, Solano MHP is working closely with Solano CWS on a case-by-case basis to ensure that CWS clients placed outside of Solano are receiving appropriate MH services, either by being Presumptively Transferred to the MHP of the county that the group home is located in, or by Presumptive Transfer Waiver with Solano MHP remaining responsible for the authorization, provision of, and payment for SMHS.

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Survey Item C4d – Regarding Presumptive Transfer:

1. Does the MHP have a mechanism to ensure timely provision of mental health services to foster children upon presumptive transfer to the MHP?
2. Has the MHP identified a single point of contact or unit with a dedicated phone number and/or email address for the purpose of presumptive transfer?
3. Has the MHP posted the contact information to its public website to ensure timely communication?

Survey Finding – DHCS reviewed: P&P AAA213 – Authorization of Children Placed Outside County of Origin, screen shot of Solano County website which lists the AB1299-Presumptive Transfer phone number, fax number, and email address.

Suggested Actions – No further action required at this time.

Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	N/A	N/A
MHP Infrastructure Building²	N/A	Review Policies to ensure updated with most recent information from DHCS
Training³	N/A	N/A
Documentation/Process Reviews⁴	N/A	N/A

- Solano MHP has identified a unit that is the point of contact for all incoming Presumptive Transfer referrals of children placed within our county. There is a dedicated email address: PresumptiveTransfer@SolanoCounty.com, and a dedicated fax number: (707) 784-8686. This information as well as the direct phone number of one staff member in our point of contact unit has been posted on our public website.
- All Presumptive Transfer referrals are logged, and we track the time from when the completed PT referral is received to the time the child/youth is referred for services. We follow the same timeliness standard that is in place for all requests for services: Routine requests for service are offered an intake assessment appointment within 10 business days of the request, and Urgent requests for service are offered an intake assessment appointment within 3 calendar days of the request.

Survey Item H2k:

1. Does the MHP have a provision for prompt reporting of all overpayments identified or recovered, specifying the overpayments due to potential fraud, waste and abuse?

Survey Finding – DHCS reviewed: Solano County Compliance Program Work Plan FY 2016-2017, Solano County Deficit Reduction Act: Fraud, Waste and Abuse, Template for Notification of Billing Errors (NOBE).

Suggested Actions – No further action required at this time.

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Solano MHP QI Information Notice¹	N/A	N/A
MHP Infrastructure Building²	N/A	Review Policies to ensure updated with most recent information from DHCS
Training³	N/A	N/A
Documentation/Process Reviews⁴	N/A	N/A

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Chart Review Findings

Finding 1c-1: Medical records did not meet medical necessity criteria since the focus of the proposed and actual intervention(s) did not address the mental health condition.		
Plan of Correction – Solano will ensure that interventions are focused on a significant functional impairment that is directly related to the mental health condition.		
Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	09/30/18	Solano MHP providers will be notified about DHCS Chart Review findings and will be made aware that the charting competencies associated with the findings will be points of emphasis for the MHP in training, monitoring and auditing activities for the duration of the current Fiscal Year.
MHP Infrastructure Building²	09/30/18	Review current annual and monthly training materials to improve the progress note section that addresses documenting MH interventions. This will also be included in future versions of Solano MHP Documentation Manual and/or Process Manual.
Training³	09/30/18	New training material will be included in MHP mandatory 2018 Annual Documentation trainings, as well as monthly documentation trainings beginning October 2018.
Documentation/Process Reviews⁴	09/30/18	This item is already included in the Solano MHP QI audit tool. MHP QI will ensure that any programs <u>not</u> in compliance with this audit item will have it included in their annual MHP Chart Audit Corrective Action Plan and will be included in any focused audits conducted.

Finding 1c-2: Medical records (line numbers ¹) did not meet medical necessity criteria because there was no expectation that the claimed intervention would meet the intervention criteria specified in CCR Title 9.		
Plan of Correction – Solano will ensure that interventions provided meet intervention criteria specified in CCR Title 9.		
Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:

¹ Line number(s) removed for confidentiality

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Solano MHP QI Information Notice¹	09/30/18	Solano MHP providers will be notified about DHCS Chart Review findings and will be made aware that the charting competencies associated with the findings will be points of emphasis for the MHP in training, monitoring and auditing activities for the duration of the current Fiscal Year.
MHP Infrastructure Building²	09/30/18	Review current annual and monthly training materials to improve the progress note section that addresses documenting MH interventions. This will also be included in future versions of Solano MHP Process Manual.
Training³	09/30/18	New training material will be included in MHP mandatory 2018 Annual Documentation trainings, as well as monthly documentation trainings beginning October 2018.
Documentation/Process Reviews⁴	09/30/18	This item is already included in the Solano MHP QI audit tool. MHP QI will ensure that any programs <u>not</u> in compliance with this audit item will have it included in their annual MHP Chart Audit Corrective Action Plan and will be included in any focused audits conducted.

Finding 2a: One or more assessments were not completed within the timeliness and/or frequency requirements specified in the MHP's written documentation standards.

Plan of Correction – Solano will ensure that providers and programs are trained to complete assessments within timelines set forth by Solano MHP.

Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	09/15/18	Solano MHP providers will be notified about DHCS Chart Review findings and will be made aware that the charting competencies associated with the findings will be points of emphasis for the MHP in training, monitoring and auditing activities for the duration of the current Fiscal Year.
MHP Infrastructure Building²	10/31/18	MHP QI and IT will complete a review of the current electronic health record reporting and reminder/alert system, to see if there is a more effective way to alert providers to complete assessments and reassessments in a timely manner.
Training³	09/30/18	New training material will be included in MHP mandatory 2018 Annual Documentation

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		trainings, as well as monthly documentation trainings beginning October 2018.
Documentation/Process Reviews⁴	09/15/18 – Annual Audit cycle begins in September	This item is already included in the Solano MHP QI audit tool. MHP QI will ensure that any programs <u>not</u> in compliance with this audit item will have it included in their annual MHP Chart Audit Corrective Action Plan and will be included in any focused audits conducted.

Finding 2b: One or more assessments did not include all required elements in the MHP Contract, including MH History, Medical History, Medications, Client Strengths, Risks.

Plan of Correction – Solano will ensure that every assessment contains all required elements written in the MHP Contract.

Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	09/15/18	Solano MHP providers will be notified about DHCS Chart Review findings and will be made aware that the charting competencies associated with the findings will be points of emphasis for the MHP in training, monitoring and auditing activities for the duration of the current Fiscal Year.
MHP Infrastructure Building²	10/31/18	Solano QI will redesign the current reassessment form, to better ensure that all elements of title 9 assessment are accurately and adequately answered. Initial assessment forms already pull for all required information.
Training³	09/30/18	New training material will be included in MHP mandatory 2018 Annual Documentation trainings, as well as monthly documentation trainings beginning October 2018.
Documentation/Process Reviews⁴	09/15/18	This item is already included in the Solano MHP QI audit tool. MHP QI will ensure that any programs <u>not</u> in compliance with this audit item will have it included in their annual MHP Chart Audit Corrective Action Plan and will be included in any focused audits conducted.

Finding 2c: An Assessment did not include the signature of the person providing the service, including the person's professional degree, licensure, or job title.

Plan of Correction – Solano will ensure that all documentation includes the signature of the person providing the service, including the person's professional degree, licensure, or job title, and the date the signature was completed and entered into the medical record.

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Solano MHP QI Information Notice¹	09/15/18	Solano MHP providers will be notified about DHCS Chart Review findings and will be made aware that the charting competencies associated with the findings will be points of emphasis for the MHP in training, monitoring and auditing activities for the duration of the current Fiscal Year.
MHP Infrastructure Building²	10/31/18	MHP QI and IT will complete a review of the current electronic health record to see if there are any errors in the electronic signature process. Additionally, MHP QI will either review and/or require all contractor agencies to do an internal review of all Assessments to ensure they have the provider's professional degree, licensure, or job title, and the date the signature was completed.
Training³	09/30/18	New training material will be included in MHP mandatory 2018 Annual Documentation trainings, as well as monthly documentation trainings beginning October 2018.
Documentation/Process Reviews⁴	09/15/18	This item will be included in the current Concurrent Review process of Assessments and Treatment plans. It is also already included in the Solano MHP QI audit tool. MHP QI will ensure that any programs <u>not</u> in compliance with this audit item will have it included in their annual MHP Chart Audit Corrective Action Plan and will be included in any focused audits conducted.

Finding 3a: The provider did not obtain and retain a current written medication consent form signed by the beneficiary agreeing to the administration of each prescribed psychiatric medication, and there was no documentation in the medical record of a written explanation regarding the beneficiary's refusal or unavailability to sign the medication consent.

Plan of Correction – Solano will ensure that a written medication consent form is obtained and retained for each medication prescribed and administered under the direction of the MHP, and will further ensure that medication consent forms are completed in accordance with the MHP's written documentation standards.

Description of correction actions, including milestones:	Timeline for implementation and/or completion of	Proposed (or actual) evidence of correction that will be submitted to DHCS:
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Solano MHP QI Information Notice¹	09/15/18	Solano MHP providers will be notified about DHCS Chart Review findings and will be made aware that the charting competencies associated with the findings will be points of emphasis for the MHP in training, monitoring and auditing activities for the duration of the current Fiscal Year.
MHP Infrastructure Building²	12/01/18	MHP QI and IT will work together to determine if there is an electronic mechanism to track and monitor Medication Consent compliance. If not, QI will build an alternative reporting mechanism, based on manual audit, that provides data on what programs have current medication consents, and request that programs self-audit on a regular basis.
Training³	09/01/18	All County-employed Medication Prescribing staff will receive training in the use of this form. All Contract Agencies have been given access to the PDF fillable form for use by prescribing staff.
Documentation/Process Reviews⁴	10/01/18	County MHP QI will work with Nursing staff in all County Adult and Children's Clinics to conduct regular reviews of Medication Consent forms. QI to work with programs to conduct internal audit checks to ensure clients have updated Medication Consents. MHP QI will also continue to monitor during annual audits.

Finding 3b: Written consents did not contain all the required elements specified in the MHP Contract with the Department.		
Plan of Correction – Solano will ensure that every medication consent process addresses all of the required elements specified in the MHP Contract with the Department.		
Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	09/15/18	Solano MHP providers will be notified about DHCS Chart Review findings and will be made aware that the charting competencies associated with the findings will be points of emphasis for the MHP in training, monitoring and auditing activities for the duration of the current Fiscal Year.
MHP Infrastructure Building²	12/01/18	An electronic Medication Consent form has been created in the MHP's Netsmart Avatar

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		electronic health record. Additionally, a fillable PDF Medication Consent form has been created that can be printed and completed as a hard copy form when necessary. Both forms are compliant with required elements specified in the MHP Contract with the Department.
Training³	09/01/18	All County-employed Medication Prescribing staff will receive training in the use of this form. All Contract Agencies have been given access to the PDF fillable form for use by Prescribing Providers.
Documentation/Process Reviews⁴	10/01/18	County MHP QI will work with Nursing staff in all County Adult and Children's Clinics to conduct regular reviews of Medication Consent forms. QI to work with programs to conduct internal audit checks to ensure clients have updated Medication Consents. MHP QI will also continue to monitor during annual audits.

Finding 3c: The Medication Consent did not include the Signature of the person providing the service, that includes the person's professional degree, licensure, or job title.		
Plan of Correction – Solano will ensure that Medication Consents include the Signature of the person providing the service that includes the person's professional degree, licensure, or job title.		
Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	09/15/18	Solano MHP providers will be notified about DHCS Chart Review findings and will be made aware that the charting competencies associated with the findings will be points of emphasis for the MHP in training, monitoring and auditing activities for the duration of the current Fiscal Year.
MHP Infrastructure Building²	12/01/18	MHP QI and IT will work together to determine if there is an electronic mechanism to track and monitor Medication Consent compliance. If not, QI will build an alternative reporting mechanism, based on manual audit, that provides data on what programs have current medication consents.
Training³	09/01/18	All County-employed Medication Prescribing staff will receive training in the use of this form. All Contract Agencies have been given access to the PDF fillable form for use by prescribing staff.

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Documentation/Process Reviews⁴	10/01/18	County MHP QI will work with Nursing staff in all County Adult and Children's Clinics to conduct regular reviews of Medication consent forms. QI to work with programs to conduct internal audit checks to ensure clients have updated Medication Consents. MHP QI will also continue to monitor during annual audits.
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Finding 4a: The Client Plan was not completed prior to planned services being provided and not updated at least annually or reviewed and updated when there was a significant change in the beneficiary's condition.

Plan of Correction – Solano will ensure that client plans are completed prior to planned services being provided, updated at least annually or reviewed and updated when there was a significant change in the beneficiary's condition. Solano will also ensure that planned services are not claimed when the service provided is not included in the current client plan.

Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	09/15/18	Solano MHP providers will be notified about DHCS Chart Review findings and will be made aware that the charting competencies associated with the findings will be points of emphasis for the MHP in training, monitoring and auditing activities for the duration of the current Fiscal Year.
MHP Infrastructure Building²	10/31/18	MHP QI will review current reports and alert systems in the Avatar electronic health record, to attempt to improve reminders to the MHP, not to provide planned services prior to the completion of the Client Plan, at the beginning of services or during the transition from the end of one authorization period to the beginning another authorization period.
Training³	09/30/18-10/31/18	MHP QI will include training on completing Client Plan prior to claiming for planned services in Annual Documentation training and ongoing Monthly Documentation trainings.
Documentation/Process Reviews⁴	09/15/18	This item is already included in the Solano MHP QI audit tool. MHP QI will ensure that any programs <u>not</u> in compliance with this audit item will have it included in their annual MHP Chart Audit Corrective Action Plan.

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Finding 4b-1: One or more of the goals/treatment objectives were not specific, observable, and/or quantifiable and related to the beneficiary’s mental health needs and identified functional impairments as a result of the mental health diagnosis.

Finding 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.

Finding 4b-3: One or more of the proposed interventions did not indicate an expected frequency.

Finding 4b-4: One or more of the proposed interventions did not indicate an expected duration.

Finding 4b-5: One or more of the proposed interventions did not address the mental health needs and functional impairments identified as a result of the mental disorder.

Plan of Correction –

4b-1: Solano will ensure that all goals/treatment objectives are specific, observable, and/or quantifiable and related to the beneficiary’s mental health needs and identified functional impairments.

4b-2: Solano will ensure that all proposed interventions include a detailed description, instead of only a “type” or “category” of intervention recorded on the client plan.

4b-3: Solano will ensure that all proposed interventions indicate an expected frequency.

4b-4: Solano will ensure that all proposed interventions indicate an expected duration.

4b-5: Solano will ensure that all proposed interventions address the mental health needs and functional impairments identified as a result of the mental disorder.

Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	09/15/18	Solano MHP providers will be notified about DHCS Chart Review findings and will be made aware that the charting competencies associated with the findings will be points of emphasis for the MHP in training, monitoring and auditing activities for the duration of the current Fiscal Year.
MHP Infrastructure Building²	10/15/18	MHP QI will review Concurrent Review Protocols and ensure that these elements are being reviewed and amended when found in client plans that are reviewed.
Training³	09/30/18-10/31/18	MHP QI will include Client Plan Goals/Objectives/ Interventions requirements in Annual Documentation training and ongoing Monthly Documentation trainings.
Documentation/Process Reviews⁴	09/15/18	These items are already included in the Solano MHP QI audit tool. MHP QI will ensure that any programs <u>not</u> in compliance with these audit items will have them included in their annual MHP Chart Audit Corrective Action Plan.

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Finding 4d-1: There was no documentation of the beneficiary's or legal representative's degree of participation in and agreement with the client plan, and there was no written explanation of the beneficiary's refusal or unavailability to sign the plan, if the signature was required by the MHP Contract with the Department and/or by the MHP's written documentation standards:		
Plan of Correction – Solano will ensure that the beneficiary's signature is obtained on the client plan, as specified in the MHP Contract with the Department, and ensure that services are not claimed when the beneficiary's signature is not obtained, and the reason for refusal is not documented.		
Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	09/15/18	Solano MHP providers will be notified about DHCS Chart Review findings and will be made aware that the charting competencies associated with the findings will be points of emphasis for the MHP in training, monitoring and auditing activities for the duration of the current Fiscal Year.
MHP Infrastructure Building²	09/01/18	MHP QI will create protocol and tracking process to only authorize planned services for 60-90 days when the signature is not on the Plan at the time of the review and authorization.
Training³	09/30/18-10/31/18	MHP QI will include Client Plan signature compliance in Annual Documentation training and ongoing Monthly Documentation trainings.
Documentation/Process Reviews⁴	10/15/18	MHP QI Concurrent Review process will be revised to ensure that Client Plans without a signature, but that document the beneficiary's participation and agreement with the plan, and provide a written explanation of the beneficiary's refusal or unavailability to sign, will only be authorized for 60-90 days. Additional authorization to claim services to Medi-Cal will only be granted after documentation is presented to MHP QI Concurrent Reviewer demonstrating a Client Plan with signature of the beneficiary or legal representative.

Finding 4e: There was no documentation that the beneficiary or legal guardian was offered a copy of the client plan.
Plan of Correction – Solano will develop a process that ensures that there is documentation substantiating that the beneficiary was offered a copy of the client plan.

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Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	09/15/18	Solano MHP providers will be notified about DHCS Chart Review findings and will be made aware that the charting competencies associated with the findings will be points of emphasis for the MHP in training, monitoring and auditing activities for the duration of the current Fiscal Year.
MHP Infrastructure Building²	10/15/18	MHP QI will review Concurrent Review Protocols and ensure that these elements are being reviewed and amended when found in Client Plans that are reviewed.
Training³	09/30/18-10/31/18	MHP QI will include the offering a copy of the Client Plan in Annual Documentation training and ongoing Monthly Documentation trainings.
Documentation/Process Reviews⁴	09/15/18	This item is already included in the Solano MHP QI audit tool. MHP QI will ensure that any programs <u>not</u> in compliance with this audit item will have it included in their annual MHP Chart Audit Corrective Action Plan.

Finding 5a: Progress notes were not completed in accordance with contractual requirements and/or with the MHP's written documentation standards.		
Plan of Correction – Solano will ensure that progress notes document: <ul style="list-style-type: none"> • Timely completion by the person providing the service and relevant aspects of client care, as specified in the MHP Contract with the Department and by the MHP's written documentation standards • The provider's professional degree, licensure, or job title. 		
Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	09/15/18	Solano MHP providers will be notified about DHCS Chart Review findings and will be made aware that the charting competencies associated with the findings will be points of emphasis for the MHP in training, monitoring and auditing activities for the duration of the current Fiscal Year.
MHP Infrastructure Building²	10/15/18	MHP will complete revision of MHP Policy to extend timely submission of progress notes to 3 business days. QI will work with all programs

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		to develop and/or review reports to monitor that progress notes are being submitted in a timely manner, according to MHP policy. Additionally, MHP QI will work with Contract Provider Agencies to create protocols to conduct internal audits, to ensure all paper progress notes include provider's professional degree, licensure, or job title.
Training³	09/30/18-10/31/18	MHP QI will include the offering a copy of the Client Plan in Annual Documentation training and ongoing Monthly Documentation trainings.
Documentation/Process Reviews⁴	09/15/18	This item is already included in the Solano MHP QI audit tool. MHP QI will ensure that any programs <u>not</u> in compliance with this audit item will have it included in their annual MHP Chart Audit Corrective Action Plan.

Finding 5c: Documentation in the medical record did not meet DHCS requirements.

Plan of Correction – Solano will ensure that the following requirements are found in future progress notation within the MHP:

- There will be a progress note for every service claimed
- The specialty MH service documented in the progress note will match the service type submitted on the claim.

Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	09/15/18	Solano MHP providers will be notified about DHCS Chart Review findings and will be made aware that the charting competencies associated with the findings will be points of emphasis for the MHP in training, monitoring and auditing activities for the duration of the current Fiscal Year.
MHP Infrastructure Building²	10/15/18	MHP will work with all Contract Agency programs to develop accounting processes for reviewing paper charts to ensure there is a copy of all claimed services in each chart.
Training³	09/30/18-10/31/18	MHP QI will include progress note compliance in Annual Documentation training and ongoing Monthly Documentation trainings.
Documentation/Process Reviews⁴	09/15/18	This item is already included in the Solano MHP QI audit tool. MHP QI will ensure that any programs <u>not</u> in compliance with this audit item will have it included in their annual MHP Chart Audit Corrective Action Plan.

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Finding 5e: Documentation indicating a Specialty MH Service was provided while the beneficiary resided in a setting that was ineligible for Federal Financial Participation or resided in a setting subject to lockouts.		
Plan of Correction – Solano will ensure that services claimed are provided in a setting where the beneficiary is eligible for FFP and not subject to lockouts.		
Description of correction actions, including milestones:	Timeline for implementation and/or completion of correction actions:	Proposed (or actual) evidence of correction that will be submitted to DHCS:
Solano MHP QI Information Notice¹	09/15/18	Solano MHP providers will be notified about DHCS Chart Review findings and will be made aware that the charting competencies associated with the findings will be points of emphasis for the MHP in training, monitoring and auditing activities for the duration of the current Fiscal Year.
MHP Infrastructure Building²	10/15/18	MHP will review practice of working with clients in inpatient psychiatric settings (when providing case management services that are not discharge planning activities), review protocols with DHCS, and then provide more clear protocols for MHP providers to follow.
Training³	09/30/18-10/31/18	MHP QI will include provision of services when clients are in inpatient settings in Annual Documentation training and ongoing Monthly Documentation trainings.
Documentation/Process Reviews⁴	09/15/18	This item is already included in the Solano MHP QI audit tool. MHP QI will ensure that any programs <u>not</u> in compliance with this audit item will have it included in their annual MHP Chart Audit Corrective Action Plan.