

**Imperial County Behavioral Health Services
Plan of Correction Timeframes**

Finding	Plan of Correction	Description	Revisions/Changes to be Made	Completed/Pending	Timeframe	Notes
Section B: "Authorization" Finding 5d	1. Update grievance log, standard appeal log and expedited appeal log to monitor the issuance of NOA-D			Completed	Submitted on 01/19/17	Submitted to Janet Rubenking
	<u>2. Training:</u> Train staff on updated logs and beneficiary protections process specifically in the area of issuance of NOA-Ds			Completed	Submitted on 01/19/17	Submitted to Janet Rubenking
Section C: "Beneficiary Protection" Finding 3a1	1. Update grievance log to identify if beneficiary was notified of 14 day extension			Completed	Submitted on 01/19/17	Submitted to Janet Rubenking
	<u>Training:</u> 1. Train staff on the updated log and on beneficiary protection process, timeframes and requirements			Completed	Submitted on 01/19/17	Submitted to Janet Rubenking
Section K: "Chart Review - Non-Hospital Services" Finding 1c-1	1. Revise and Implement written Documentation Standards Policy #01-133	<p>a) The focus of the intervention(s) address 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) and</p> <p>b) The expectation that the proposed intervention(s) will:</p> <ol style="list-style-type: none"> 1. significantly diminish the impairment; and/or 2. prevent significant deterioration in important area of life function as delineated in CCR, title 9, chapter 11, section 1830.205(b)(3) 		Pending	4/28/2017	

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	<u>2. Training:</u> Train staff on revised policy and process and monitor compliance to policy adherence			Pending	6/30/2017	
	3. Update Progress Note Review Tools (mental health, targeted case management, crisis intervention)	Include a section that is specific to the review and monitoring that documented interventions focus on a significant functional impairment that is directly related to the mental health condition		Pending	3/30/2017	
	<u>4. Training:</u> Train staff on specialty mental health services, medical necessity criteria and the appropriate delivery of medically necessary specialty mental health services			Pending	3/30/2017	
	5. Monitor compliance and only claim for services that meet medical necessity			Ongoing	Monthly	
Section K: "Chart Review - Non-Hospital Services" Finding 2a	1. Draft procedure to include scheduling process and outline staff's roles and responsibilities			Pending	4/28/2017	
	2. Revise re-assessment forms to be completed by the assigned service coordinator			Pending	4/28/2017	
	<u>3. Training:</u> Train staff on updated forms and roles and responsibilities			Pending	6/30/2017	

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Section K: "Chart Review - Non-Hospital Services" Finding 2b	1. Update Assessment and re-assessment forms to ensure all required elements are captured and appropriately labeled			Pending	4/28/2017	
	2. EHR: make required fields mandatory to ensure necessary information is being collected			Pending	3/30/2017	
	3. Once re-assessment is converted into the EHR, all required fields will be made mandatory			Pending	4/28/2017	
	<i>4. Training:</i> Train staff on the new forms and requirements			Pending	6/30/2017	
Section K: "Chart Review - Non-Hospital Services" Finding 3b	1. Update Medication Consent Form	1. The reason for taking each medication 2. Reasonable alternative treatments available, if any 3. Type of medication 4. Range of frequency 5. Dosage 6. Method of administration 7. Duration of taking each medication 8. Probable side effects 9. Possible side effects 10. Consent once given may be withdrawn at any time		Complete	See Attachment A	

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Section K: "Chart Review - Non-Hospital Services" Finding 4b	1. Revise Client Plan - Initial (Procedure 01-74), CP - Annual (Procedure 01-76) and CP - Update (Procedure 01-75)	1. Specific, observable, and/or specific quantifiable goals/treatment objectives related to the beneficiaries' mental health needs and functional impairments as a result of the mental health diagnosis 2. The proposed type(s) of intervention/modality including a detailed description of the intervention to be provided 3. The proposed frequency and duration of intervention(s) 4. The proposed duration of interventions 5. Interventions/modalities that focus and address the mental health needs and identified functional impairments as a result of a mental disorder or emotional disturbance 6. Mental health interventions that are consistent with the client plan goal(s)/treatment objective(s)	Completed	Submitted on 12/07/16	.
	2. Update Client Plan form to include all items specified in MHP contract with DHCS		Completed	See Attachment B	
	3. Training: Train clinical staff on the revised procedures		Completed	See Attachment C	
	4. Monitor compliance to procedure adherence at the supervisory/managerial level during monthly client plans due review		Ongoing	Monthly	

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	5. When inconsistencies are found a "Delinquent Client Plan Review" form will be completed and provided to responsible clinical staff for correction and followed up by the supervisor until confirmation of completion			Completed	See Attachment D	
Section K: "Chart Review - Non-Hospital Services" Finding 4e	1. Revise Client Plan - Initial (Procedure 01-74), CP - Annual (Procedure 01-76) and CP - Update (Procedure 01-75)	1. Include a step where staff confirm that a copy of the client plan is offered and provided to the client		Completed	Submitted on 12/07/16	
	2. Update Client Plan form	1. Include a check box that indicates that client/caregiver was offered a copy of the Client Plan		Completed	See Attachment B	
	3. <u>Training</u> : Train clinical staff on the revised procedures			Completed	See Attachment C	
	5. Monitor compliance to procedure adherence to continue at supervisory/managerial level			Ongoing	Monthly	

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Section K: "Chart Review - Non-Hospital Services" Finding 5a	1. Create on standard Activity Sheet Log which corresponds to Procedure 01-161 "Staff Activity Summary and Documentation Critiquing" to be used by all divisions within the department			Pending	3/30/2017	
	<u>2. Training:</u> Train all staff on the completion of the new Activity Sheet Log			Pending	4/28/2017	
	3. E-Signature, professional degrees, and licensure/job title automatically generated in AVATAR			Completed	Completed	Electronic signature of the person providing the service, the person's degree, and licensure or job title are now automatically generated by the MHP's electronic health record
	<u>4. Training:</u> Train clinical and clerical staff on department Policy 01-133 "Documentation Standards", Policy 01-134 "Documentation Standards - Late Entry", and Procedure 01-161 "Staff Activity Summary and Documentation Critiquing"			Pending	6/30/2017	
	5. Monitor compliance to the aforementioned policies and procedure at the supervisory level			Ongoing	Monthly	

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	6. Revise and implement department Policy 01-133 "Documentation Standards" to include: a. Interventions applied, the beneficiary's response to the interventions, and the location of the intervention			Pending	4/28/2017	
Section K: "Chart Review - Non-Hospital Services" Finding 5b	1. Revise Policy 01-133 "Documentation Standards" include components needed in the group progress note, such as, contribution, involvement and participation of each staff member as it relates to the functional impairment and mental health needs of the client			Pending	4/28/2017	
	<u>2. Training:</u> Train clinical staff on revised Policy 01-133 " Documentation Standards" to ensure proper documentation of medical necessity of the use of multiple staff in the group setting			Pending	6/30/2017	
	3. Revise the Group Progress Note to clearly state the contribution, involvement or participation of each staff member as it relates to the identified functional impairment and mental health needs of the beneficiary			Pending	4/28/2017	

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	<p><i>4. Training:</i> Train clerical staff on proper critiquing of group notes to ensure that the type of service, units of time and dates of service claimed are accurate and consistent with the documentation in the medical record</p>			<p align="center">Pending</p>	<p align="center">6/30/2017</p>	