Alameda County BHCS – Substance Use Disorder (SUD) Documentation Training

March 8, 2017

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Today's Agenda

9:00-9:45a	Introductions
9:45-10:15a	SUD Regulations
10:15-11:15a	Intake & Admission
11:00-11:15a	Morning Break
11:15-12:00p	Assessment & Establishing Criteria For Medical Necessity
12:00p-12:30p	Lunch Break
12:30-1:45p	Treatment Plans
1:45p-2:00p	Afternoon Break
2:00p-3:00p	Progress Notes
3:00p-3:30p	Group Notes & Requirements
3:30p-4:00p	Discharge Plans & Summaries

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Introduction & Auditing Plan-FY 16-17

- Annual & Quarterly; ACBHCS SUD System Of Care Medical Records Review
 - Expected to begin 5/2017
 - Minimum 2 charts from ALL SUD programs
 - Technical Assistance Feedback
 - DHCS monitoring Unit is providing on-site technical assistance independent of BHCS
 - Please let Sharon know if DHCS contacts your agency to conduct a chart review
 - This will assist us in providing accurate technical assistance to all of our providers





DMC Provider Responsibilities



- It is you and your staffs' responsibility to know and follow ALL applicable regulations
 - Title 22 § CCR 51341.1 can be found here: <u>https://govt.westlaw.com/</u>
- Employ qualified staff and make sure staff stay within their scope of practice!
- Develop and document procedures for admission
- Establish an individual record for every DMC beneficiary. Maintain record for a minimum of 3 years (or as required by law)
- Ensure medical necessity is documented in beneficiary records
- Complete a personal, medical, and substance use history upon admission
- Ensure that client's challenges identified are addressed in treatment plan and progress notes.
- Complete discharge plan OR discharge summary upon discharge
- SUD Treatment MUST be provided under the direction of a licensed physician

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Role of the SUD Medical Director

Each DMC provider must have a *Medical Director who* has medical responsibility for ALL CLIENTS and MUST be available on a regularly scheduled basis. Duties of a *Medical Director* may vary, but at a minimum, DMC certified treatment provider medical directors are responsible for:

- Establishing, reviewing, & maintaining medical policies and standards source: 22 CCR §51341.1 (b)(28)(A)
- Ensuring the quality of medical services provided to all clients source: 22 CCR §51341.1 (b)(28)(A)(i)(a)
- Ensuring that a physician has assumed medical responsibility for all clients treated by the provider source: 9 CCR § 10110
- SUD Medical Director must obtain 5 hrs. continuing education in Addiction Medicine Annually. - source: 22 CCR §51341.1 (b)(28)(A)(iii)

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Alameda County SUD Providers' Admission/Pre-Admission Process

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COMING SOON!!

Call Screening Tool --Form Highly Recommended—

Three (3) page form that will comply with upcoming pre-admission screening requirements.

This form is included with the handouts

		Call Screening Too nce Use Disorder		
Date: Time	:	Screener:		
Client Name:			Date of Birth:	
Age: Ethnicit	у:	Gender Identi	ty: <u>Male / Female / Tr</u>	ansgender / Other
Phone # 1:			Phone # 2:	
	tant to you, that you v	vant help with, or th	at made you decide to	call today? (If caller is
Drug of Choice	Route of Administration	Frequency last 30 days	Frequency last 12 months	Continuous use at age:
Do you have Current N	/ledical Coverage: Y / N	If Yes: Insura	ance Provider:	
Primary Physician:			_	
Current Medical Condi	tion(s):			
Psychiatric Diagnosis/0	Condition(s):			
If yes, is the Mental He	alth Professional Invo	lvement: past / prese	nt / both past & prese	nt?
lf yes, Mental Health P	rofessional Name;		Location;	
Current Prescribed Me	dications:	P	'harmacy:	
Any current mental he	alth symptoms you we	ould like a referral for	(i.e. depression or anxie	ty)? Yes / No
Living Situation: Marrie	ed / Living with a Partr	ner / Living with Famil	ly / Other / Single	
Female Clients Only: A	re you pregnant? Yes /	No / Unknown		
Do you have children?	Yes / No / Unknown	lf yes, do you	have custody? Yes / N	o / Unknown
Number of children:	Children(s) Ages	E		
Are you Employed / At	tending School / Uner	nployed / Disability /	Other?	
If employed, do you w	ork: Part Time / Full T	ime Do you work:	Evenings / Days	
	Employer Location	1:		
Hours per Week:				
Hours per Week: Client Address/Place o		Cit	ty:	Zip:



Health Screening / Questionnaire -DHCS Form 5103 highly recommended-

- REQUIRED be completed during admission process, PRIOR TO INTAKE
- AOD-Certified programs' Health Questionnaire MUST contain at minimum the information in the DHCS 5103
 - Client should complete on their own unless they require assistance
 - Must be reviewed and signed by staff
- Used to help determine if client has immediate medical needs that would impact their ability to safely participate in SUD Treatment
- Health Questionnaire requirement is NOT a substitute for medical history in screening/assessment

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DHCS Form 5103: Health Screening Questionnaire

Meets requirements of Title 22 CCR §51341.1 (h)(1)(A)(ii)&(iii) and AOD Alcohol And Drug Certification Standards Section 12020

DHCS Form 5103, Version (06/16) this is a 10 page form: http://www.dhcs.ca.gov/provgovpart/Documents/DHCS_5103.pdf

Substance Use Dep Literary and Cett	et of Histoffs Gave Services roters Compliance Division Musico Service, MD 2002 PO Back WP113 enemetins, CA 2008/07/413	State of California — Health and Hun	an Services Agency	Department of Head Substance Use Disorders Con Licensing and Certification S Secretients	witance Division
			rug and/or Alcohol		
CLIENT HEALTH QUESTIONNAIRE AND INITIAL SCREENING	QUESTIONS	 Have you received atophola give details 	im or drug abuse recovery treat	ment services in the past? If y	wa, please
HEALTH QUESTIONNAIRE INSTRUCTIONS		Type of Previous Recovery Treatment (Outpatient, Residential, Ontmattication)	Name of Previous Treatment Facility	Dates of Previous Treatment	Treatment Completed (Yes or No)
If Incidental Medical Services (IMS) are to be provided, the <u>incidental Medical Service</u> Form (INES 4020), and the Health Care Practitioner Incidental Medical Service Form (INES 5220), mult be completed, reviewed and signed by a Health Care	es Acknowledgement				
CLIENT HEALTH QUESTIONINARE		45. Have you ever laten treated	for withdrawal symptoms? If a	n, pinaoe state the dates you a	ere beated
Name: Date of firm:		and list any medications that	(MER PRICES)		
Name: Date of Birty					
Date:					
Physical					
Physical					
1. I Have you ever had a heart attack or any problem associated with the ha but when, what was the diagnose and if you are currently taking medi-	eart? If yes, please	I declare that the above infor			He:
		Reviewing Facility/Program Staff	A CARTER OF		
2 Are you currently experiencing sheat pain(s)? If yes, please give detail		Reviewing Facility/Program Staff	Squitze	Date	
		DHC SIZE OK/35 Heath Quarterey	111111		Face 2
(343 515) (04/36) Health Questionnane and Initial Screening Form	Page 1		and and point streams from		refe i
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Available in handout section!

Intake and Assessment of Substance Use Disorders under DMC

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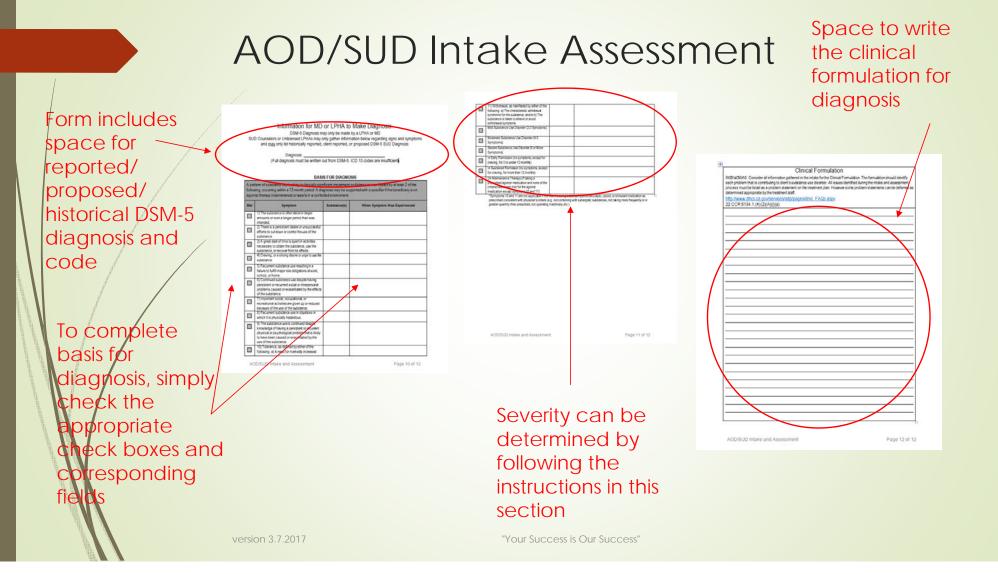
Intake Assessment --AC BHCS Form Highly Recommended--

- Providers must complete a personal, medical, and substance use history for each beneficiary at admission
 - Physician must review within 30 days of episode opening date source: 22 CCR §51341.1 (h)(1)(A)(iii)
- Required components of admission/intake source: 22 CCR §51341.1 (b)(13)
 - Social, economic, family, education, employment, criminal, and medical history
 - Legal status and previous treatment history
 - Client substance use history
 - Evaluation or analysis of the cause or nature of mental, emotional, psychological, behavioral, and substance use disorder(s), the diagnosis of substance use disorders, and the assessment of treatment needs
 - Perinatal programs (DMC or non-DMC) have additional requirements (see Perinatal slide)
- ACBHCS has created a 12 page AOD/SUD Intake and Assessment Form that fulfills DMC requirements.
 - This form is available in the included documents—is highly recommended for compliance
 - and on the ACBHCS provider website (coming soon!)

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AOD/SUD Intake Assessment





Consent to Treat

- Written consent for treatment IS a requirement of ACBHCS
- If missing/not completed at the time of admission will result in a fully non-compliant chart.
- Consent to treat MUST be signed by the client, demonstrating informed consent has been reviewed



Perinatal Residential Assessment

Additional specific DMC requirements for Perinatal Residential treatment plans apply to both Drug Medi-Cal and Non-Drug Medi-Cal Perinatal programs.

- Was a need for mother/child habilitative services assessed in the Intake?
- Does the mother need assistance in accessing ancillary services (dental, social, community, educational/vocational, and other services that are medically necessary to prevent risk to the fetus)?
- Prenatal exposure to substances harms developing fetuses. Was this assessed in the Intake?
- Were sexual or physical abuse issues assessed in the Intake?
- Were service access needs (i.e. transportation, financial, other barriers) assessed in the Intake?

Source: 22 CCR § 51341.1 (c)(4)

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Establishing Medical Necessity for SUD under DMC

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Relevance of Medical Necessity for Documentation – GOLDEN THREAD

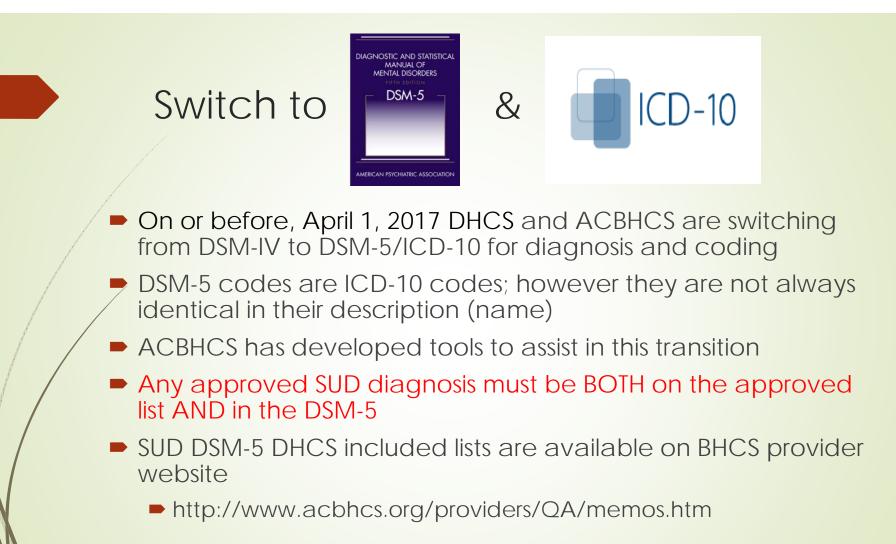
Initial assessment documentation identifies problems to be addressed in SUD treatment. The Physician establishes Medical Necessity by reviewing all information and making the diagnosis, complete with a <u>written basis</u> for the diagnosis (see exceptions for completing written basis).

Initial client plans are based on the Initial Assessment and must indicate all identified problems that were identified unless counter indicated. These may be prioritized for work during the Tx Plan period.

Client/Treatment plan updates document the ongoing Medical Necessity and progress towards completion of the program.

Progress Notes must contain evidence that the services claimed for reimbursement are helping client achieve their treatment plan.

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approved ICD-10 codes*

2-22-17 ACBHCS SUD Medi-Cal Included Diagnoses alpha by DSM-5 description

ICD-10	DSM-5 Diagnosis Name	ICD-10 Diagnosis Name
F10.129	Alcohol intoxication, With mild use disorder	Alcohol abuse with intoxication, unspecified
F10.229	Alcohol intoxication, With moderate or severe use disorder	Alcohol dependence with intoxication, unspecified
F10.929	Alcohol intoxication, Without use disorder	Alcohol use, unspecified with intoxication, unspecified
F10.10	Alcohol use disorder, Mild	Alcohol abuse, uncomplicated
F10.20	Alcohol use disorder, Moderate	Alcohol dependence, uncomplicated
F10.20	Alcohol use disorder, Severe	Alcohol dependence, uncomplicated
F10.239	Alcohol withdrawal, Without perceptual disturbances	Alcohol dependence with withdrawal, unspecified
F15.229	Amphetamine or other stimulant intoxication, Without perceptual disturbances, With moderate or severe use disorder	Other stimulant dependence with intoxication, unspecified
F15.929	Amphetamine or other stimulant intoxication, Without perceptual disturbances, Without use disorder	Other stimulant use, unspecified with intoxication, unspecified
F15.23	Amphetamine or other stimulant withdrawal	Other stimulant dependence with withdrawal
F15.10	Amphetamine-type substance use disorder, Mild	Other stimulant abuse, uncomplicated
F15.20	Amphetamine-type substance use disorder, Moderate	Other stimulant dependence, uncomplicated
F15.20	Amphetamine-type substance use disorder, Severe	Other stimulant dependence, uncomplicated
F12.129	Cannabis intoxication, Without perceptual disturbances, With mild use disorder	Cannabis abuse with intoxication, unspecified
F12.229	Cannabis intoxication, Without perceptual disturbances, With moderate or severe use disorder	Cannabis dependence with intoxication, unspecified
F12.929	Cannabis intoxication, Without perceptual disturbances, Without use disorder	Cannabis use, unspecified with intoxication, unspecified
F12.10	Cannabis use disorder, Mild	Cannabis abuse, uncomplicated
F12.20	Cannabis use disorder, Moderate	Cannabis dependence, uncomplicated
F12.20	Cannabis use disorder, Severe	Cannabis dependence, uncomplicated

*ICD-10 diagnoses crossed out are not found in DSM-5 & can not be basis for SUD treatment.

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approved ICD-10 codes*

2-22-17 ACBHCS SUD Medi-Cal Included Diagnoses List numeric by ICD-10 code

ICD-10	DSM-5 Diagnosis Name	ICD-10 Diagnosis Name
F10.10	Alcohol use disorder, Mild	Alcohol abuse, uncomplicated
F10.129	Alcohol intoxication, With mild use disorder	Alcohol abuse with intoxication, unspecified
F10.20	Alcohol use disorder, Moderate	Alcohol dependence, uncomplicated
F10.20	Alcohol use disorder, Severe	Alcohol dependence, uncomplicated
F10.229	Alcohol intoxication, With moderate or severe use disorder	Alcohol dependence with intoxication, unspecified
F10.239	Alcohol withdrawal, Without perceptual disturbances	Alcohol dependence with withdrawal, unspecified
F10.929	Alcohol intoxication, Without use disorder	Alcohol use, unspecified with intoxication, unspecified
F11.129	Opioid intoxication, Without perceptual disturbances, With mild use disorder	Opioid abuse with intoxication, unspecified
F11.20	Opioid use disorder, Moderate	Opioid dependence, uncomplicated
F11.20	Opioid use disorder, Severe	Opioid dependence, uncomplicated
F11.229	Opioid intoxication, Without perceptual disturbances, With moderate or severe use disorder	Opioid dependence with intoxication, unspecified
F11.23	Opioid withdrawal	Opioid dependence with withdrawal
F11.929	Opioid intoxication, Without perceptual disturbances, Without use disorder	Opioid use, unspecified with intoxication, unspecified
F12.10	Cannabis use disorder, Mild	Cannabis abuse, uncomplicated
F12.129	Cannabis intoxication, Without perceptual disturbances, With mild use disorder	Cannabis abuse with intoxication, unspecified
F12.20	Cannabis use disorder, Moderate	Cannabis dependence, uncomplicated
F12.20	Cannabis use disorder, Severe	Cannabis dependence, uncomplicated
F12.229	Cannabis intoxication, Without perceptual disturbances, With moderate or severe use disorder	Cannabis dependence with intoxication, unspecified
F12.929	Cannabis intoxication, Without perceptual disturbances, Without use disorder	Cannabis use, unspecified with intoxication, unspecified

*ICD-10 diagnoses crossed out are not found in DSM-5 & can not be basis for SUD treatment.

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DMC Physical Examination Requirements Physical Examinations are an integral part of DMC Treatment

Scenario A:

If the beneficiary has had a physical exam in the 12 months prior to the date of admission, then the physician must review documentation of this exam. If the physician is unable to obtain documentation of this exam, then efforts to obtain should be documented.

Scenario B:

If beneficiary has not had a physical exam in the 12 months before admission, a physician, registered nurse practitioner, or physician's assistant may perform a physical examination within 30 days of admission. The physician MUST review documentation of this exam within 30 days of episode opening

Scenario C:

If a physical examination has not been completed within the last 12 months OR the physician does not review the exam record AND/OR new exam is not completed, then the initial treatment plan MUST have a goal of obtaining a physical exam.



It is not acceptable to roll this (or any other) goal over from one Plan to the next, without revisiting the current obstacles and what modified action steps will allow for the goal to be met in the new Plan time period. (Reason for chart non-compliance from that Plan date and onward.)

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"Your Success is Our Success"

Source: 22 CCR § 51341.1 (h)(1)(A)(iv)

Physician Responsibilities

- "For a provider to receive reimbursement for Drug Medi-Cal substance use disorder services, those services shall be provided by or under the direction of a physician" - 22 CCR § 51341.1 (h)
- DMC physician MUST be licensed by the Medical Board Of California or the Osteopathic Medical Board of California 22 CCR § 51341.1 (b)(21)
- That treatment provided is known to be effective in improving health outcomes and in accordance with generally accepted standards.
 - Ensure physical exam requirements are met
 - Specific information on 'DMC Physical Examination Requirements" slide
- Review, approve, and sign Treatment Plan and updates within accepted timelines
 - For specific information see Treatment Plan section
- For specific physician responsibilities for Naltrexone Treatment Services see Naltrexone Treatment Services Section

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Physician Responsibilities & Medical Necessity

- The DMC physician MUST determine and document whether SUD services are medically necessary:
 - SUD Services are "...reasonable and necessary to protect life, to prevent significant illness or significant disability, or to alleviate severe pain through the diagnosis or treatment of the disease, illness or injury covered by the Medi-Cal program."
- Physician must indicate that they reviewed each client's personal, medical, and substance abuse history – Source: 22 CCR § 51341.1(h)(1)(A)(iii)
 - Document the basis for SUD diagnosis in the client's individual patient record the MD must specify the DSM criteria that is met for the Dx (unless Licensed or Registered LPHA specifies and then MD co-signs); Chart out of compliance if incomplete - Source: 22 CCR § 51341.1 (h)(1)(A)(v)

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Medical Necessity & Assessment Review Cont.

All are reasons for full chart non-compliance from the date of non-compliance until completed.

- What is the timeline for establishing medical necessity and on-going treatment for AOD Medi-Cal programs?
 - Within 30 days (NTP = 28 days, Residential = 14 days) of the Episode Opening Date (EOD);
 - 90 Days from therapist signing of the previous plan for Plan Update (Narcotic Treatment Programs at "least once every quarter --aka every three months)--from EOD"); and
 - Between 5 and 6 months (from the Initial Medical Necessity or Last Justification for Continuing Treatment) the Justification for Continuing Tx must be established by the Physician with determination of Medical Necessity and with a recommendation from the counselor or therapist to continue treatment (except NTP).

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Non-Drug Medi-Cal Medical Necessity Requirements

- For AOD Residential with non Drug Medi-Cal (DMC) Claiming—Medical Necessity is not required to be signed by the MD.
- A "Therapist" (Licensed or Registered with Board of Psychology or California Board of Behavioral Sciences) may sign.
- If no such staff work for the agency indicate "Non DMC program" on signature line.

Initial Medical Necessity Form

INITIAL MEDICAL NECESSITY FORM IS REQUIRED BY BHCS

- Physician MUST indicate they have reviewed each client's personal, medical, and substance abuse history
- Document the basis for SUD diagnosis in the client's individual patient record—the MD must specify the DSM criteria that is met for the Dx (unless Licensed or Registered LPHA specifies and then MD co-signs); Chart out of compliance if incomplete

Determine and document whether SUD services are medically necessary:

- SUD Services are "...reasonable and necessary to protect life, to prevent significant illness or significant disability, or to alleviate severe pain through the diagnosis or treatment of the disease, illness or injury covered by the Medi-Cal program."
- MUST be completed within 30 days of the date of admission
- MUST be signed by physician

Source: 22 CCR § 51341.1 (h)(1)(A)(v)

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Use the ACBHCS Medical Necessity Form(s) and always be in compliance!

Medical Necessity: Providing the Rationale for SUD Services Check Box: I Initial Justification for Continuing Services

The physician or Licensed Provider of the Healing Arts (LPHA - therapist, physician assistant, nurse practitioner) acting within their respective practice, shall evaluate each beneficiary, within thirty-(30) calendar days of the client's admission to treatment date, to diagnose whether the beneficiary has a substance use disorder. The diagnosis shall be pased on the applicable diagnostic code from the DSM published by the American Psychiatric Asposition. The

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DNF to complete this section too

hysician Must Initial Either 1 or 2:				
1After review of the above named inform			atment is <u>n</u>	ot
medically necessary and the beneficiary should				
After review of the above information,				
or conditions that would place the client at exc				
is receiving appropriate and beneficial treatme	ent that (can reasonably be expected to improv	e the diag	nosed
condition.				
Primary Diagnosis: Medi-Cal included Se	econdar	y Diagnosis: (not required)		
Physician Note: MUST State Specific Criteri	a for th	ne DSM Medi-Cal Included Prim	ary Diag	nosis
			~	
. The client has a primary Medi-Cal Included SUD diagr		m the Diagnostic and Statistical Manu		
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Physician or Authorized LPHA Signature	Print Name and Title	Date
If LPHA Signed, M.D. Must Co-Sign	Print Name and Title	Date

AOD SUD P&P Doc Standards Rev Med Nec 9-19-1

Client Name

The physician or Licensed Provider of the Heali

DMC requires 'basis for diagnosis' to be completed. This section can contain details that supports the SUD dx for the client—if NOT WRITTEN OUT full chart noncompliance!

Make sure ALL signatures are in compliance: legibly printed name, signature, and date MUST be included—if all three req's not met; full chart non-compliance!

Justification For Continuing Services Form *FORM REQUIRED BY BHCS*

- JCS Form MUST be signed by a physician no sooner than 5 months and no later than 6 months from date of admission or previous medical necessity form
- Physician MUST indicate that they reviewed each client's personal, medical, and substance abuse history
- Document the basis for SUD diagnosis in the client's individual patient record—the MD must specify the DSM criteria that is met for the Dx; if not complete chart non-compliance. (Note, there is no exception to the written basis of the Dx by the MD if the Therapist does it as in the Initial Medical Necessity Form)
 - Used to determine and document whether continuing SUD services are medically necessary:
 - SUD Services are "...reasonable and necessary to protect life, to prevent significant illness or significant disability, or to alleviate severe pain through the diagnosis or treatment of the disease, illness or injury covered by the Medi-Cal program."
- Signing of Treatment Plan Update by the physician DOES NOT meet requirement of Justification for Continuing Services
- Source: 22 CCR § 51341.1 (h)(5)(A)

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Naltrexone Treatment Services (NTS)

- --additional requirements of Medical Necessity Form--
- Provider shall document / confirm that the client has a documented history of opiate addition.
- Is at least 18 years of age

YI

- Has been opiate free for a period of time to be determined by physician based on physician's clinical judgment
 - Provider shall administer a body specimen to confirm client is opiate free
- The physician shall certify the beneficiary's fitness for Naltrexone treatment based on medical history, physical examination, and laboratory results
- The physician shall advise the beneficiary of the overdose risk of using opiates while taking Naltrexone and ineffectiveness of opiate pain relievers
- Source: 22 CCR § 51341.1 (h)(1)(B)(i)

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Perinatal / Pregnancy Residential



 Women in Perinatal Residential Treatment must be pregnant or less than 2 months postpartum—to claim AOD Medi-Cal.

What COUNTS as proof of pregnancy or last date of pregnancy?

- Hospital discharge paperwork
- Forms signed by a medical professional

DMC regulations ONLY permit these as proofs of pregnancy.

What does NOT count?

- Birth Certificates
- Home Pregnancy Tests

Both would result in full chart non-compliance.

Source: 22 CCR § 51341.1 (g)(1)(A)(iii)



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Residential Treatment Programs Non-Perinatal, Non-DMC

- Similar charting requirements and documentation timelines as DMC perinatal residential
 - Justification For Continuing Services and Medical Necessity is required:
 - May be signed by LPHA or physician/MD
 - MD signature not required if no medications are being prescribed
 - BHCS is seeking clarification regarding treatment plan requirements for nonperinatal residential programs.



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Medical Necessity & Assessment Review Questions

- What are the three (3) requirements for Medical Necessity?
 - A DHCS included SUD diagnosis which is the Primary Focus of Treatment
 - SUD Services are "...reasonable and necessary to protect life, to prevent significant illness or significant disability, or to alleviate severe pain through the diagnosis or treatment of the disease, illness or injury covered by the Medi-Cal program.?
 - Treatment provided is known to be effective in improving health outcomes and in accordance with generally accepted standards.
- Who is the ONLY final authorized signer for Initial Medical Necessity?
 - The Physician or Medical Director
 - For the Initial Medical Necessity documentation ONLY (not continuing justification) the Physician or Medical Director may co-sign the Therapist (<u>Licensed or Registered</u>: Psychologist, Clinical Social Worker, Professional Clinical Counselor or Married and Family Therapist), PA, or NP's Medical Necessity and Diagnosis (who must have described the basis for Dx).
- Who MAY NOT formulate a diagnosis?
 - Certified SUD Counselor and/or Registered SUD Counselor

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Medical Record Requirements

Charting Requirements Individual Client Record

- Each client must have an individual record that meets HIPAA compliance for confidentiality
- NO other identifying information is allowed in another client's record
 - In past audits, charts were fully disallowed because they contained multiple client information, often in the form of combined group notes
 - As a result, the patient record was not considered unique
 - References to other clients should happen only when absolutely necessary and done anonymously (e.g. "another client")
 - Never use other clients' initials, names,

nicknames, etc.

Source: 22 CCR § 51341.1 (g)(1)(A)



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Individual Client Record

- Client record MUST include:
 - A unique identifier
 - Client's InSyst number
 - Client's DOB
 - Client's gender (aka sex), gender identity, sexual orientation and other cultural factors
 - Client's race or ethnicity
 - Client's address or indicate "homeless" for address
 - Client's telephone number or again indicate "homeless" for no telephone
 - Client's record and InSyst record must include emergency contact information with Release of Information (or reason why this was not provided)

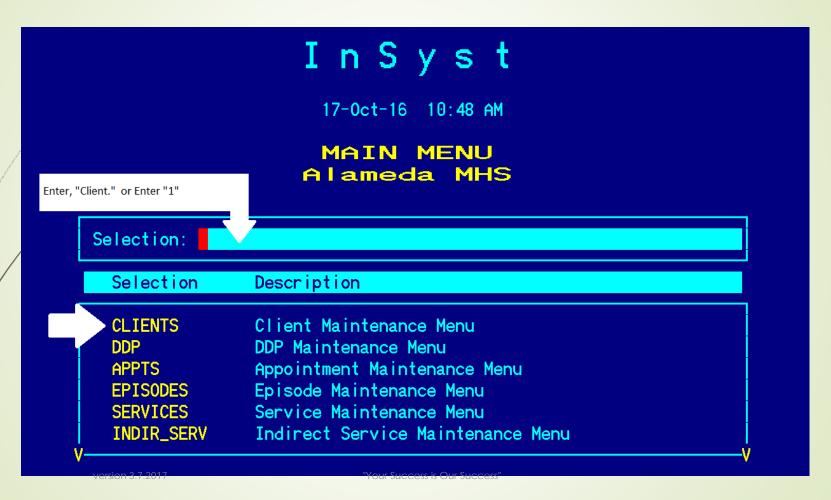
Source: 22 CCR § 51341.1 (g)(1)(A)

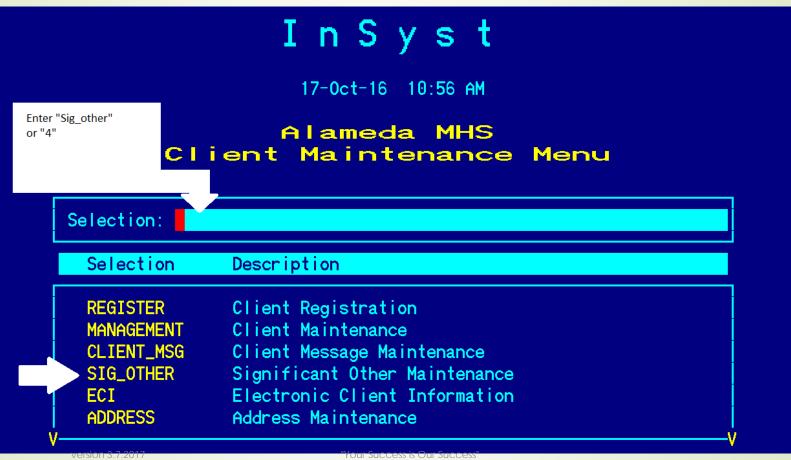
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"Your Success is Our Success"

Without-will result in the entire chart being non-compliant





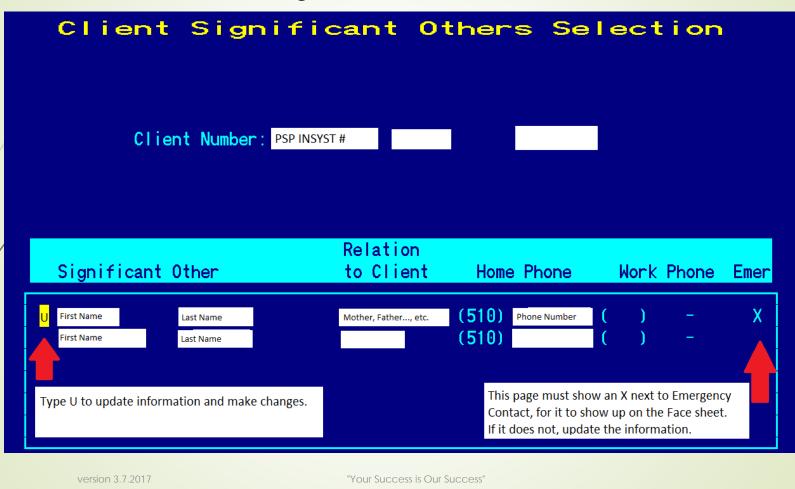


Client Significar	nt Others Selection
Client Number:	 When a client is first registered, there is an option to enter Significant Other information. If no information is entered, INSYST will default to 'No Significant Other' and information on the Face Sheet will be blank. In order to add Significant Other and Emergency Contact information, you must enter Num-Lock I. (This is the command for inserting information.) This will take you to 'Client Significant Other Insert' page (see corresponding Powerpoint slide for more directions). If a client's Significant Other information was entered at registration and needs to be updated, the client's PSP/INSYST number can be entered on this page. This will pull up a 'Client Significant Other <u>Update</u> page.' (see corresponding Powerpoint slide for more directions).
	ation Client Home Phone Work Phone Emer
version 3.7.2017 "Y	our Success is Our Success"

Inserting Significant Other Info if None was Entered at Episode Opening.

Client Sig	gnificant O	thers Insert
Client Number:	75134621 BABY	TEST
Name Last: SIMPSON Relationship to Client: I		Effective Date: 10/21/2016 Expiration Date: / /
Street Number: 742 Direction: Name: EVERYGREEN Type: Apartment: Make sure to	TERRACE Country:	Zip Code: 94619+ 555 USA e: (510) 867-5309 Ext.: 0 e: () - Ext.: 0
X Emergency Contact Don't Display on Rpts		X Family Member V
Continue: <mark>Y</mark> Successful insert. Insert	Confidential Informat total = 1.	ion USER: SAMMISJ
version 3.7.2017	"Your Success is Our Succes	SS"

Updating Significant Other Information that has already been entered.



Client Number	PSP #				
Name Last: ^{Last Name} Relationship to Client:	First: Fir MOTHER	st Name	Effective Expiratio	Date: Date you en n Date: / /	
Street					
Number: 0		City:			
Direction:		State:	Zip Code:	00000+ 0	
Name:		Country:			
Туре:					
Apartment:		Home Phone	e: (510) Phone		
ake sure this has an X in this field.		Work Phone	ə: ()	- Ext.: 0	
Comment: client's fos	ter mother				
X Emergency Contact	X Client's	Guardian	Fami	ly Member	
Don't Display on Rpts	Primary (Caregiver			

Face Sheet with Emergency Contact Info

	Client Information F	ace Sheet	
Report MHS 140			
Run Date: 21-OCT-2016			Page: 1
*****	*********	*****	*******
	CONSUMER INFO	RMATION	
Name: BABY TEST	Number: 75134621	Birthdate: 1-JAN-19	50 Age: 66
Address:	SSN:	Sex: F	
, 00000	Other ID #: 0	Language: Thai	
Phone: () =	Marital: Nvr Marr	Education: None	
Staff:	Disability: None	Ethnicity: O So Asi	an Hispanic Origin:
Aliases: None			
RP Owes: \$0.00	Medicaid: Not Eligible		
Insurance: None			
	SIGNIFICANT	OTHERS	•
Name Relation Home Phone	Work Phone	Address	Emergency
SIMPSON MARGE MOTHER (510) 867-5	i309 () -	742 EVERYGREEN TERRACE, SP	RINGFIELD, CA 94619-0555 X
****	*****	******	*********
	CLINICAL HI	STORY	
Primary		Total Last Leg	al Legal Stability
RU Opening Closing Diag	Clinician Physician	Units Service Sta	tus Consent Rating & Date
CLOSED EPISODES			
WEST MHS 2-JUL-07 28-JUL-14 295.70	WHITE, R Staff, G	0 W60	000 NA
****	******	*****	*****

Total Episode Count = 1

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We are so in sync

Treatment Plans & Documentation

"We are so *NSync"

Treatment Plans & Documentation

DMC (And Non DMC Programs): Required Parts of a Treatment Plan --BHCS Treatment Plan Form Highly Recommended--

- A statement of problems to be addressed
- Attainable goals of the client that focuses upon their personal vision of recovery, wellness, and the life they envision for themselves
 - Include strengths
- Challenges from reaching the goals which may include specific symptoms and impairments of the Approved Dx
- Indicate Area(s) of Difficulty: Alcohol and or Drugs / Family & Social Skills / Legal / Employment & Support / Recovery Environment / Emotional, Behavioral and/or Cognitive Conditions & Complications
 - Indicate Level of Difficulty: Mild, Moderate, Severe

Source: 22 CCR § 51341.1 (h)(2)

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DMC (And Non DMC Programs) Required Parts of a Treatment Plan Cont.

- Assignment of a primary therapist or counselor
- A description of services
 - Frequency-per week or per month
 - Type of Service-group, individual (intake, crisis and only scheduled-treatment planning), collateral
- If a beneficiary has not had a physical examination within the twelve month period prior to beneficiary's admission to treatment date, a goal that the beneficiary have a physical examination—if goal is carried over to the following Tx Plan, the current Barriers and needed Action Steps must be indicated.
- DSM/ICD Dx

Source: 22 CCR § 51341.1 (h)(2)

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DMC (And DMC Programs) Required Parts of a Treatment Plan Cont.

- Action Steps (by Client, family, significant other) with target dates for accomplishment (aka objectives)
 - Providers assist the client in developing the short-term action steps to his/her identified goal(s)
 - Includes Measurable Change in helping the client achieve his/her treatment goals;
 - Can address symptoms, behaviors and impairments (problems) identified in the assessment
 - Strength based SUD objectives replace problematic symptoms with positive coping skills/behaviors/ etc.
 - SMART is ideal (but not required): Specific, Measurable, Attainable, Realistic, and Time Bound

Source: 22 CCR § 51341.1 (h)(2)

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DMC (And DMC Programs) Required Parts of a Treatment Plan Cont.

- Action Steps Continued—Provider's Action Steps (aka Interventions)
 - Provider Action Steps must focus upon and Problems identified in the Assessment and Intake process.
 - Interventions for Collateral (see prior slides) should include listing significant others by their names and roles (professional relationships do not qualify for Collateral services) for whom contact is planned and indicating "others as needed"

Source: 22 CCR § 51341.1 (h)(2)

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Initial Treatment Plan Signatures

Which providers can sign SUD Initial Treatment Plans?

- Non-MD (with MD co-signature, see upcoming slides with timelines--and exception for Plan Updates or Non-DMC programs).
 - Therapist
 - Psychologist licensed by CA Board of Psychology
 - LCSW or MFT licensed by CA BBS
 - Intern registered by the CA BBS or CA Board of Psychology
 - Counselor
 - Certified AOD Counselor or Registrant
- Or physician may be the sole Provider signer
- Non AOD Medi-Cal Programs require no Tx Plan signature by Physician or LPHA—SUD Counselor adequate.
- If the beneficiary is unable or unwilling to sign the plan, the provider shall document the reason for refusal and the provider's strategy to engage the beneficiary to participate in treatment-if not full chart non-compliance.

Source: 22 CCR § 51341.1 (h)(2)(A)(i)(h)(ii)

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All Treatment Plan Signatures

- Per Title 22 Reg. Treatment Plan signatures must include ALL of the following parts for each individual, including the beneficiary, signing the plan:
 - Typed or legibly written name
 - Signature
 - Date Note that beneficiaries MUST write in the date themselves
 - Professional Credentials Recommended

Source: 22 CCR § 51341.1 (h)(2)(A)(i)(h)(ii)(a),(b),&(c)

One of the most common causes of non-compliance is due to incomplete signatures that did not contain all three above requirements—if not on Plan, full chart non-compliance.



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Initial Treatment Plans: Physician Responsibilities

- Physician MUST review the treatment plan and determine if treatment outline in the plan is medically necessary.
 - It is not required that the physician meet face to face with the client to develop the treatment plan.
- If the physician determines the services in the initial treatment plan are medically necessary, the physician shall type or legibly print their name and sign and date the treatment plan within 15 days of signature by the therapist or counselor (but no more than 30 days from EOD,)—if not full chart non-compliance.

Source: 22 CCR § 51341.1 (h)(2)(A)(i)(h)(ii)(c)

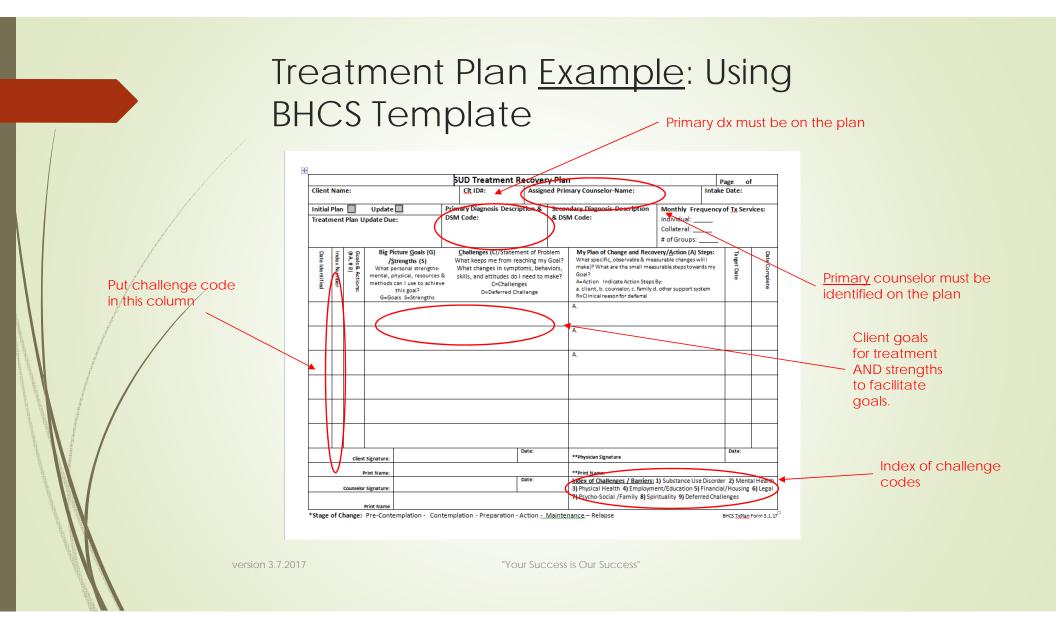
- Initial Narcotic Treatment Programs Treatment Plan is due within 28 calendar days and has an additional Plan Update due within 14 days of any confirmed pregnancy. MD has a full 14 days after the Counselor or Therapist's signature to sign the Plans.
- AOD Residential—non AOD M/C Claiming, Tx Plan is due within 14 days (of long-term programs 31 days or longer), and Updates no longer 90 days after prior Tx Plan. (No MD co-signatures required).

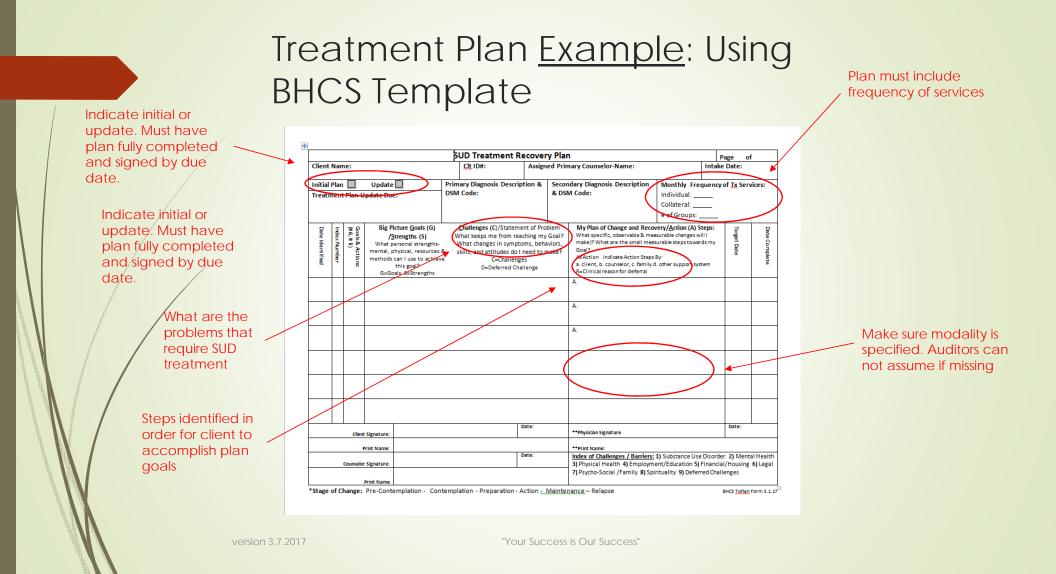
Treatment Plan Template --Form Highly Recommended--

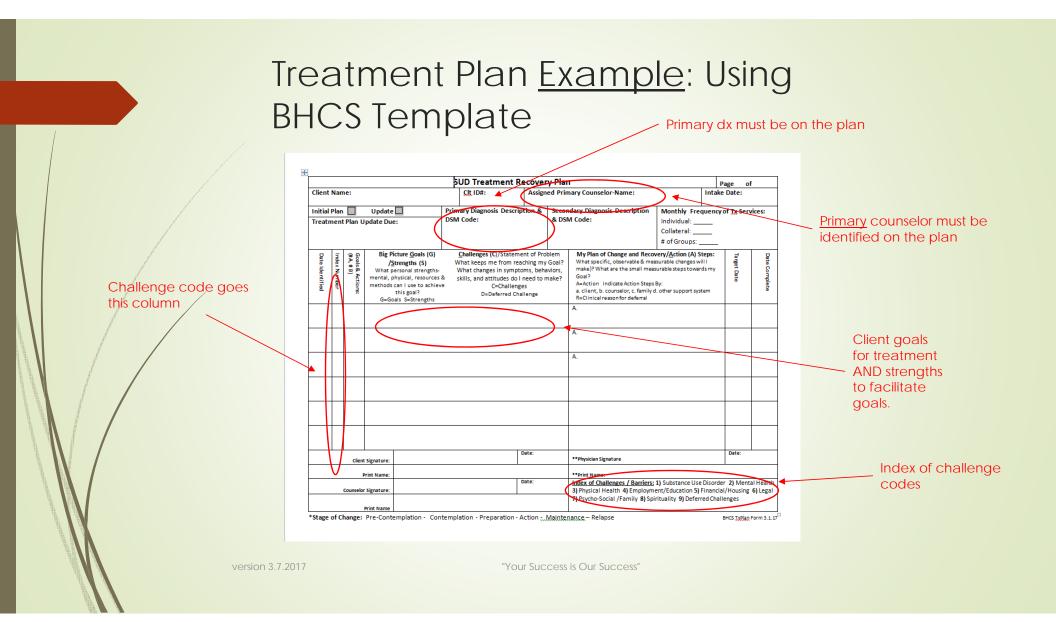
This treatment plan template is available as a handout in the binder and online at the BHCS Provider site—highly recommended to ensure compliance and avoid noncompliance. Address every field and instructions.

			SUD Trea	atment Reco	very Pla	n		Page	of
lient Nar	ne:		Cit ID#:	A	signed Prin	mary Counselor-Name:		Intake Date	:
nitial Plar reatmen		Update 🔲 pdate Due:	Primary Diagn DSM Code:	osis Description		ndary Diagnosis Description M Code:	Monthly Free Individual: Collateral: # of Groups: _	_	Services:
Index Number Date Identified	Goals & Actions: (#A, # B)	Big Picture Goals /Strengths (S) What personal stren mental, physical, resou methods can I use to a this goal? G=Goals S=Streng	What keeps gths- What chang irces & skills, and a chieve D=	(C)/Statement o me from reachin ges in symptoms, ttitudes do I need C=Challenges Deferred Challeng	g my Goal? behaviors, i to make?	My Plan of Change and Recov What specific, observable & mea make]? What are the small meas Goal? A=Action Indicate Action Steps a. client, b. counselor, c. family d R=Clinical reason for deferral A.	surable changes wi surable steps towar By:	illi dsmy Date	nare complete
						A.			
						A.			
	Client	Signature:		Date:		++Physician Signature		Date	:
		rint Name: Signature:		Date:		•••Print Name: Index of Challenges / Barriers: 3) Physical Health 4) Employme 7) Psycho-Social /Family 8) Spi	ent/Education 5)	Financial/Hou	

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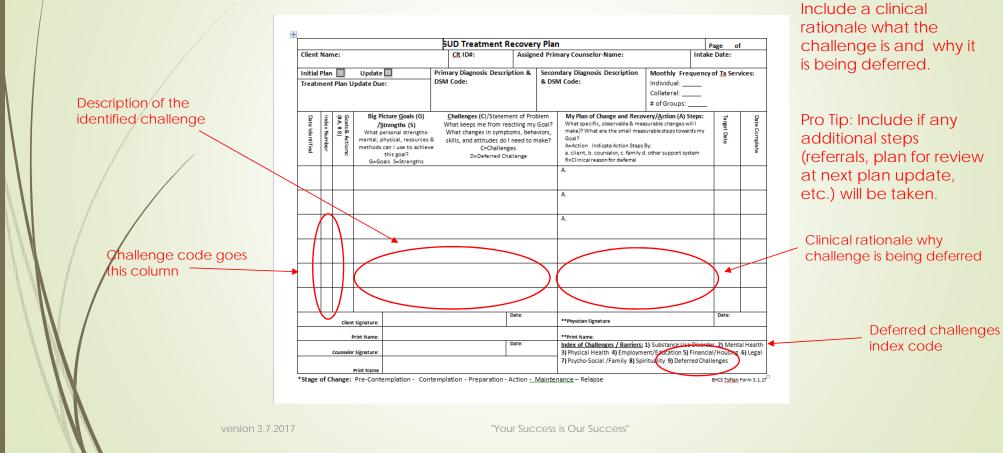




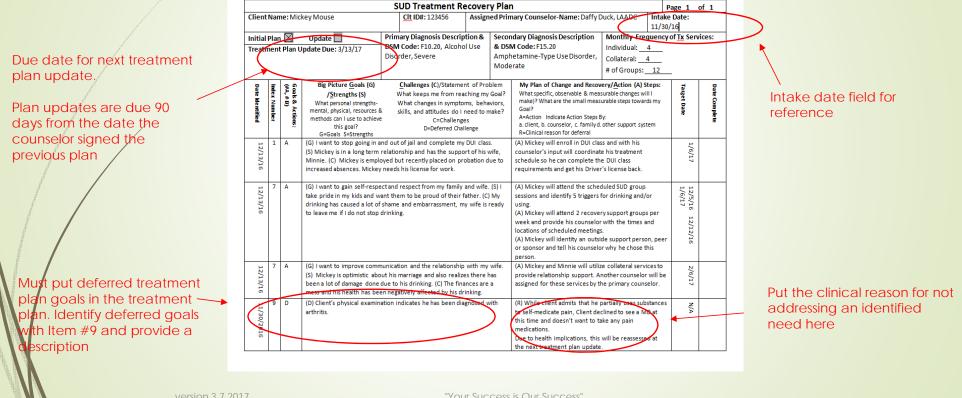
Treatment Plan <u>Example</u>: Deferring Challenges

Challenges identified in the assessment but not

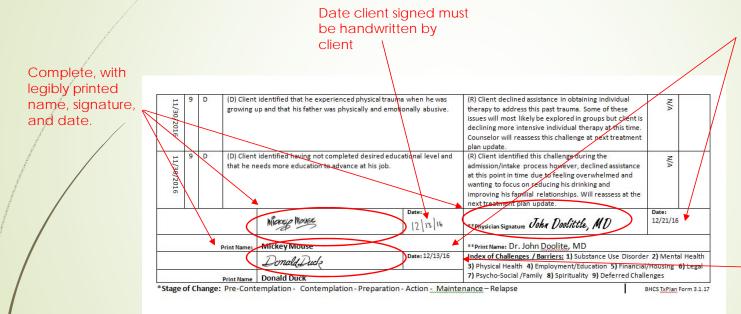
being addressed in the plan MUST be deferred.



Treatment Plan Example: Using **BHCS** Template



Treatment Plan <u>Example</u>: Using BHCS Template



Physician reviewed/signed within 15 days of counselor signature AND within 30 days Intake/EOD

Date of treatment plan = Date signed by counselor

Client MUST sign initial plan within 30 days of admission

And for plan update MUST sign within 30 days of counselor and no more than 90 days from previous plan counselor signature

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Important Treatment Plan Update Timeline Requirements All result in non-compliance if not met

Tréatment Plan Updates

- Treatment Plans must be updated as client's functioning changes; at a minimum every 90 days (pregnant NTP clients have an additional Tx Plan due within 14 days of established pregnancy)
- Therapist MUST complete the treatment plan update no later than 90 days after the signing of the previous treatment plan
- The client must review and approve the update treatment plans within 30 days of the therapist or counselor signing the treatment plan AND within the required 90 day timeline
 - Remember per DMC All Signatures: must include not only a signature, but also: date signed, and legibly printed or typed name. Client must write-in the date of their signature themselves.

Source: 22 CCR § 51341.1 (h)(2)(A)(i)(h)(iii)

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Important Treatment Plan Update Timeline Requirements Cont. *All result in non-compliance if not met*

- The physician must review, sign, date, and legibly print their name within 15 days of the therapist or counselor's completed signature.
 - Non AOD M/C Programs do not require Physician signature— SUD Counselor is adequate.
- If the MD has not prescribed medications, a CA state board licensed psychologist may sign the treatment plan update -Source: 22 CCR § 51341.1 (h)(2)(A)(i)(h)(iii)(c)
 - MUST review, sign, date, and legibly print their name within 15 days of the therapist or counselor's completed signature

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Narcotic Treatment Programs (NTP) -Treatment Plans

Two key differences

- Initial treatment plan must be completed within 28 days after initiation of maintenance treatment
- Pregnant NTP clients have an additional Tx Plan due within 14 days of established pregnancy
- Treatment plan updates are to be completed whenever necessary due to changes in the client's functioning – or AT LEAST every 3 months
 - The effective date is based on the primary counselor's signature on the plan
 - NTP Treatment Plans are governed by Title 9, CCR §10305

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Potential Treatment Plan non-compliance

- All services will be disallowed for the entire chart when:
 - Treatment Plan signatures (MUST INCLUDE date signed & printed/typed names) are missing or incomplete
 - The criteria for the diagnosis with physician's complete signature is not present (see limited exceptions on prior slides)
 - The additional Perinatal Assessment & Plan items were not assessed and addressed. (See Perinatal Slides)
- What are some common reasons for treatment plan non-compliance?
 - Primary counselor not identified in the treatment plan
 - Frequency, Duration and Type of Services (modalities) not specified
 - Goals, Objectives and Measurable Action Steps are missing or vague

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Perinatal Residential Treatment Plans

Additional specific DMC requirements for Perinatal Residential treatment plans apply to both Drug Medi-Cal and Drug Non-Medi-Cal Perinatal programs.

- Was a need for mother/child habilitative services identified in the assessment?
 - If yes, the treatment plan must include a goal, action steps, and target date to accomplish this goal
- Does the mother need assistance in accessing ancillary services (dental, social, community, educational/vocational, and other services that are medically necessary to prevent risk to the fetus)?
 - If yes, the treatment plan must include a goal, action steps, and target date to accomplish this goal

Perinatal Residential Treatment Plans Cont.

- Prenatal exposure to substances harms developing fetuses. If this is identified as a need in the assessment there must be a goal to provide education to the mother, action steps, and target date must be included in the treatment plan to address this problem.
- Were sexual or physical abuse issues identified in the assessment?
 - If yes, the treatment plan must include a goal, action steps, and target date to accomplish this goal
- Are there service access needs (i.e. transportation, financial, other barriers) identified in the assessment?
 - If yes, the treatment plan must include a goal, action steps, and target date to accomplish this goal

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Continuing SUD Services

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Justification for Continuing SUD Treatment — BHCS FORM REQUIRED --

- Must occur no sooner than five (5) months and no later than six (6) months from the date of admission / episode opening date—if not full chart noncompliance after six months of EOD.
 - Required for Narcotic Treatment Program Medical Director shall discontinue within 2 years of beginning of Tx unless completes the following: Evaluates progress of lack of progress of Tx Goals, and Determines in his/her clinical judgement that such treatment should be continued. Source: 9 CCR § Article 5, 10410
 - Therapist or counselor must review client's progress and eligibility to continue treatment and document recommendations Source: 22 CCR § 51341.1 (h)(5)(A)(i)

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Justification for Continuing SUD Treatment Cont.

- The physician must determine whether continued services are medically necessary (consistent with Title 22 CCR § 51303) and <u>documented by the</u> <u>physician</u> that the following has been considered:
 - Client's personal, medical, and substance use history
 - Documentation of the client's most recent physical exam
 - Client's progress notes and treatment plan goals
 - Therapist or counselor's recommendation
 - Client's progress

Source: 22 CCR § 51341.1 (h)(5)(A)(ii)

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Justification for Continuing SUD Treatment Cont.

ACBHCS has created a form to assist with compliance for continued treatment. This form is available as a handout and on the BHCS provider website—<u>required for</u> <u>compliance and to prevent</u> <u>non-compliance</u>.

JUSTIFICATION		r date of last JCSTS shall be
For each beneficiary, no sooner than 5 mon completed. DMC SUD Services 22 CCR § 51	nths and no later than 6 months after date of admission o	
Agency Name:	1341.1 (1) (3)	
Client Name:	Client ID:	Date:
Admission to Treatment Date:	Date of Most Red	cent JCSTS:
Counselor Recommendation:		
I recommend that the above named clie	ent continue to receive treatment services based on	review of the beneficiary
progress in treatment and eligibility to o		
Counselor Additional Comment (not req	quired):	
Counselor Signature	Printed Name & Title	Date
Physician's Statement:	tablishing medical necessity, the physician shall sign	المعتادين الترتيك والمتعالم
	the basis for the DSM-SUD & Other diagnosis in the b	
patient record.		renenally 5 marriadar
PRIMARY DSM DIAGNOSIS:	SECONDARY DSM DIAGNOSIS:	
Physician's Note:		
Patient Information that has been cons	sidered includes the following:	
Patient Information that has been cons The beneficiary's personal, med		
 The beneficiary's personal, med *Physical Exam (when available 	dical and substance use history; e);	
 The beneficiary's personal, med *Physical Exam (when available The beneficiary's progress note: 	dical and substance use history; :); :s and treatment plan goals;	
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Progress Notes

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Progress Notes - ODF and Naltrexone Treatment Services(and Non-DMC non-residential programs) *All reasons for non-compliance.*

- For each claimed service, there must be an individual progress note documenting that service
- Group counseling notes must be completed for each session and specific to the individual client
 - No other client information is allowed in another client's chart/record
- Notes must be completed and signed within seven (7) calendar days—and dated with date of signature (not just service date)— if not out of compliance
 - Alameda County BHCS documentation requirement

version 3.7.2017

Progress Notes - ODF and Naltrexone Treatment Services(and Non-DMC non-residential programs) Cont. *All reasons for non-compliance.*

- Each note must contain:
 - The topic of the session (Relapse Prevention, Relationships, etc.)
 - A complete signature of the therapist or counselor
 - If multiple notes are combined on a single page, each note must have all of the required parts
 - The type of counseling format (i.e. individual, group, collateral, crisis)
 - A <u>description of the client's progress</u> towards treatment plan challenges, goals, action steps, objectives, and or referrals
 - Information about the client's attendance in the group and individual counseling sessions—including <u>Start and End Times (not just total minutes)</u>.

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"Your Success is Our Success" Source: 22 CCR § 51341.1 (h)(3)(A)

Progress Notes – IOT & Perinatal Residential Programs (and-DMC Residential) *All reasons for non-compliance.*

- Must have at least one (1) progress note per calendar week (recommend short note for each service to inform the weekly note), containing:
 - A description of the client's progress towards treatment plan challenges, goals, action steps, objectives, and or referrals
 - Information about client's attendance at each session, including the date, start and end time, and topic of the session
 - Each note must have the complete provider signature
 - Notes must be completed and signed within the following calendar week of the services

22 CCR § 51341.1 (h)(3)(B)

version 3.7.2017

Progress Notes – IOT Only All reasons for non-compliance.

 The record must document a minimum of three (3) hours per day for three (3) days per week of individual or group sessions

 Or structured therapeutic activities were offered & available (per schedule) AND one of the three

1. Document the one-time occurrence as to why they didn't attend or attended less than 3 hours—specific to any given day or week--with proof such as scheduling slip for MD appt conflict, etc.

2. If difficulty engaging, assess nature of difficulties and update Treatment Plan (within 1 – 2 weeks) with new action steps. If Plan is not updated by end of week 2 step down to ODF.

3. If Plan is modified and client does not respond (by the end of 3rd week) then step down to ODF or consider other referrals such as co-occurring IOT.

If IOT no longer clinically indicated, step down to ODF

See attached SUD-IOT Services document

and see 22 CCR § 51341.1 (h)(4)(A)(i),(ii)



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Progress Notes --Recommended form--

ACBHCS has developed a progress note form for providers that is available on the BHCS Provider website

CI .	e Mari					101		_
Lilen	t Nam	e:				ID#		_
Service Date	Type of Service	Start/ End Time	TX Plan Index # (s)	Behavior: What are the CKs, observations, thoughts and comments? What are the Counselor's observations (affect, mood, appearance)?	Intervention: What Cit goals & objectives were discussed? Was homework reviewed or assigned?	Response: What was the Other propries to the session and their progress in reaching treatment goals?	Plan: Does the ty plan need to be updated? What are the Counselor's next steps and when is the next session date?	Date Note
_								
_								
		1						
nvice	Types:				Counselor or Thereoir	t is required to legibly print the	ir name, sim and date FACH or	ote
Intake, Index	/Individu		oup=G tance Use I		ase Most=CM Ja Plan=TP 3) Physical Health	Transport=TR Medication 4)Employment/Education dded=TBA Not Applicable=M	M Discharge Plan=DP C 5) Financial/Housing 6	ote. Other) Leg:

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Sample Progress Notes

Available as a handout in the rear of your binder

			CLIENT PROGRESS NOTES			
Client Nam	ne: Mick	ey Mou				
Service Date Type of	Service Start/End Time	Tx Plan Index # (s)	Behavior: What are the CI:S Intervention: What CI: Response: What was the CI:S response: What was the CI:S response to the section conventor's behaviors Plan: Dese the to plan meet to be updated? With discussed? Was homework and their progress in reviewed or assigned? Plan: Dese the to plan cI:S response to the section are the Counselor's news resching treatment goals? Plan: Dese the to plan meet to be updated? (affect, mood, appearance)? reviewed or assigned? reviewed or assigned? reviewed or assigned?	2		
1/16/17 Group	6p to 7:30p	F	B: Client shared that he continues to drink alcohol daily and discussed how he does not know how to stop. Mood and affect appeared angry, agitated, and with feelings of stress. I: Client participated in Anger Management / SUD Group. Facilitators assisted group in discussing alternative coping strategies to reduce angry responses and impact of SUD (and resulting anger) on interpersonal relationships. R: Client participated in the group when directly asked but did not volunteer much on his own. Seemed distracted and had trouble focusing on the topic. P: Client will continue to attend groups to gain increased understanding of the impact of substance use on relationships. Will work with client on developing more effective and less destructive ways to cope with stress.			
			DemaltDuck			
			Donald Duck, LAADC			
1/18/17 Collateral	2:15p to 2:50p	2	B: counselor met with client's wife due to her concerns about client's continued substance use. Client signed a Release of Information on 11/30/16 allowing counselor to discuss client's treatment. Client's wife shared that client uses substances every day and does not appear to be slowing down. She shared that he is very difficult to be around and that she has thoughts of leaving him. I: Counselor spoke at length to client's wife, discussing ways she can provide support when he relapses; for example how to set appropriate boundaries with client, when to encourage client to contact his sponsor, to encourage client to share his feelings of sadness at groups. Counselor shared some of the coping mechanisms and stress relieving techniques client is working on in groups [listening techniques, reducing reactivity, alternative behaviors]. R: Client's wife thanked counselor for advice on ways to provide support for client and how to set boundaries with him when he is dinking, Client's wife agreed to try some of these techniques and wou contact client's reports, client continues to demonstrate significant impairment due to daily us of substances. Client continues to struggle with stress management and may be taking out work related stress at home.	a E 1/22/17		
			Demald Duck			
			Donald Duck, LAADC			
1/22/17 Group	6p to 7:20p	1	B: Client discussed still feeling angry about his previous day at work. Shared having a difficult time waki up and that he had a drink [beer] immediately upon waking. I: Client attended Mindfulness croup, Facilitators encouraged participants to recall previous times in th lives when they had success managing stress and anger without using substances. Group members link, this to their current situation and identified specific ways they can use these in their current position. R: Client appeared despondent and unfocused. He left the group about 10 minutes early stating he was getting tired and had to take the bus home. P: Client will continue to attend groups to gain increased understanding of the impact of substance use on relationships. Will work with client on developing more effective and less destructive ways to cope with stress.	eir sd		
			Demald Dudy			
			Donald Duck, LAADC			
Services Types: Counselor or Therapist is required to legibly print their name, sign and date E Instale/Individual-I Group=G Crises=C Collateral=CO Caze Mingt=CM Tx Plan=TP Transport=TR Medication=M Discharge Plan=1						
Index #s: 1) Substance Use Disorder 2) Mental Health 3) Physical Health 4)Employment/Education 5) Financial/Housin						
ss is Our The dat	ate of the o	counselin	7] Psycho-Social /Tamily 8] Spirituality To 8e Added=TBA Not Applicable=N/A Session may be different than the date note is signed. Notes must be legibly printed, signed and dated b erapist the day of service or no later than 7 calendar days from the date of the counseling session.	y the		

CLIENT PROGRESS NOTES

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DMC Minimum Contact Requirements All reasons for non-compliance.

- For ODF and Naltrexone Treatment Services, the record must document at least two face to face sessions per 30 day period
 - If client does not meet this requirement, document close of services
 - There are two exceptions to this regulation if documented:
 - Fewer contacts are deemed clinically appropriate
 - Client is progressing toward treatment plan goals
 - Source: 22 CCR § 51341.1 (h)(4)(A)
- For IOT attendance requirements see prior slides & SUD-IOT Requirements Doc.
 - Source: 22 CCR § 51341.1 (b)(8)
- Narcotic Treatment Programs



- Client shall receive a minimum of 50 minutes of counseling per month
 - The Medical Director may adjust or waive this requirement and document the clinical rationale behind the waiver
- Source: 22 CCR § 51341.1 (h)(4)(B)

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Collateral Services

- Are <u>face to face</u> sessions with the SUD therapists (or SUD counselor) and any significant persons in the life of a beneficiary, focusing on the treatment needs of the beneficiary in terms or supporting the achievement of the beneficiary's treatment goals.
- Significant persons are individuals that have a personal relationship(family member, non-paid advocate, sponsor, etc.), AND not an official or professional relationship (CWW, Probation Office, Teacher, etc.) with the beneficiary.

Must be indicated in Tx Plan with frequency (2x/month).

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SUD Group Treatment

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SUD Groups

- SUD groups must be between 2 and 12 participants reason for non-compliance
 - Groups larger than 12 participants must be broken into two separate groups with different SUD Counselors.
 - Group size updated by: CA State Plan Amendment (SPA) 15-012 Substance Use Disorder Services Expansion and Definition Changes
- A client that is 17 years of age or younger can not participate in group counseling with any participants who are 18 years of age or older—reason for non-compliance
- However, a client who is 17 years of age or younger may participate in group counseling with participants who are 18 years of age or older when the counseling is at a provider's certified school site

Source: 22 CCR § 51341.1 (b)(11)

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Group Sign-In Sheets All reasons for non-compliance.

Improper handling of group sign-in sheets was a frequent cause of non-compliance during prior SUD audits

Required parts of group sign-in sheets include (22 CCR § 51341.1 (g)(2)):

- Date of the group session
- Topic of the group
- Start and End Times of the group
- Typed or legibly printed names of the participants (this can be pre-typed)
- Signature of each participant (must be clear that it matches the name—if not legible due to client's writing inability, counselor must indicate.)
- Group sign-In sheets should be kept separate from the chart as it contains multiple clients' PHI and provided to BHCS whenever a chart is audited

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Group Sign-In and signatures



Facilitators must enter date of group and start/end times to be in compliance. (Recommend they also type, legibly print names of clients.)

DMC SUD groups must be between 2 and 12 members

Keep sign-in sheets separately in order to maintain HIPAA compliance and confidentiality

When charts are requested for audit, remember to provide all corresponding sign-in sheets, otherwise the auditor is unable to confirm group compliance.

Discharge Summary & Discharge Plan

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Discharge: Summary v. Plan --see highly recommended compliant forms--

- A discharge plan is a plan to support client's discharge from the program
 - A plan is developed in conjunction with the client and is intended to transition client from treatment services
 - Can be claimed when completed face-to-face with client
 - Discharge plans should be prepared (discussed and signed with client) within 30 days prior to the last face-to-face treatment with client in order to be claimed
- A discharge summary is a summary of treatment services, progress, and prognosis—this is required when contact is lost with the client.
 - Must be completed within 30 days of last face-to-face service
 - Can be claimed if completed with the client face-to-face
 - Otherwise, should be non-billable

Source: 22 CCR § 51341.1 (h)(6)

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Discharge Plans

- Recent SUD Audit indicated that client discharges are not being documented or completed according to DMC requirements
- When provider has lost contact with client, a discharge plan is not required, but the circumstances should be documented in a non-billable note & Discharge Summary.
- Must document that client was provided (or offered and reason for refusal) a copy of their discharge plan at the last face-to-face. - Source: 22 CCR § 51341.1 (h)(6)(A)(iii)

"Client discharged from the program" Is not a discharge plan!

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Discharge Plans --Form Highly Recommended--

- Discharge plans MUST include:
 - Description of each client's triggers and a plan to assist the client to avoid relapse when confronted with triggers
 - A support plan
 - Complete signature of therapist or counselor
 - Client's legibly printed name, date, and signature

Source: 22 CCR § 51341.1 (h)(6)(A)(i)

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Discharge Summary Required when Client Contact Lost --Form Highly Recommended--

- Discharge Summary MUST include:
 - Duration of treatment (admission date to date of last service)
 - Reason for discharge and if discharge was involuntary or successful completion of SUD services
 - Client prognosis
- If the discharge summary was not completed face-to-face with client, it must be disallowed
- Source: 22 CCR § 51341.1 (h)(6)(B)

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Drug Medi-Cal Eligibility

- Check Medi-Cal Eligibility the first week of each month (if any services are being claimed to Medi-Cal).
 - If client loses Medi-Cal for a given month, or no longer meets Medi-Cal criteria (such as for Perinatal IOT in Residential).
 - Close case to Medi-Cal with D/C Summary and provide client with Fair Hear Notification. Continue to serve client as if Medi-Cal is being claimed.
 - If Medi-Cal is regained—provide note in client's chart that Medi-Cal case is reopened.

Alameda County BHCS requirement

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Sources / Resources

- CA CCR Title 22: <u>http://bit.ly/2hwel56</u>
- <u>https://www.sfdph.org/dph/files/CBHSdocs/SUD-Treatment-Provider-Manual.pdf</u>
- http://www.dhcs.ca.gov/formsandpubs/Documents/Info%20Notice%20201 5/Enclosure%204_15_30.pdf

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