

## Memo

**Date:** September 12, 2025

**To:** Alameda County Behavioral Health Department (ACBHD) Specialty Mental Health Services (SMHS) Providers

**From:** Torfeh Rejali, Division Director, Quality Assurance *Torfeh Rejali*

**Subject:** SMHS System of Care Audit Results- Quarter 2 - FY 2023- 2024

---

### Purpose

This memo is to advise of the publication of the FY 2023-2024 SMHS System of Care audit that was completed by the ACBHD Quality Assurance (QA) division.

### Background

ACBHD QA completed an audit of the SMHS System of Care for the period of **October 1, 2023, to December 31, 2023**. The System of Care audit report is an aggregate analysis of adherence with Medi-Cal claiming requirements and documentation standards. The report, accessible [here](#), can also be found in the Internal Audit section of the [QA Audits](#) page on the ACBHD provider website.

### Overview of General Findings

Fifteen (15) providers were selected for this audit. Fifteen (15) charts (9 from Child/Young Adult and 6 from Adult/Older Adult systems) and 385 claims were reviewed for compliance with Medi-Cal claiming requirements and quality of care documentation standards.

#### Claims Compliance

Of the 385 claims reviewed during the audit, 371 were compliant. Four percent (4%) of the claims were disallowed, resulting in a **claims compliance rate of 96%**. This was consistent with the claims disallowance rate of 4% during the prior audit period (FY 2022-2023).

For claims disallowances, the following common issues were identified:

- Incomplete documentation and/or erroneous billing of services involving multiple providers (e.g., each provider's service activities were not described in progress notes, or duplicate claims were submitted for a single service)
- Submission of claims for services not billable under Title 9 (e.g., purely administrative or clerical activities)

### Quality Compliance

The audit tool included 51 distinct review items. **Overall quality compliance** for all review items was **86%**, which was greater than the quality compliance score of 81% during the prior audit period (FY 2022-2023).

For all review items, the following common issues were identified:

- Next Steps, a required element of Progress Notes, missing sufficient detail and individualization
- Missing documentation of telehealth consent (written or verbal) prior to the initial delivery of telehealth services
- Inconsistent/missing documentation of monthly verification of Medi-Cal eligibility
- Medical history missing details of the prescriber and dosage of psychotropic medications
- Missing updates to the Problem List
- Insufficient documentation of ongoing assessment, clinical monitoring, and interventions related to identified safety risks
- Informing Materials missing certain required elements such as completed checkboxes confirming distribution of member materials or member signatures

### **QA Process and Support**

QA Audit Leads met with individual providers to review their findings and provided coaching and support, as needed. Required Corrective Action Plans (CAPs) were submitted by providers and reviewed by QA to ensure they sufficiently addressed the identified issues. Examples of plans included more frequent review of charts by agency QA teams using the Clinical Quality Review Team (CQRT) tool, implementation of updated versions of ACBHD forms & templates, updates to agency Electronic Health Records to better capture the required information, training and re-training of staff, and periodic reviews of ACBHD QA memos to ensure compliance with requirements.

ACBHD QA will continue to monitor and reinforce these issues in monthly Brown Bag and other meetings.

### **Action Required**

Please make note of the common issues identified and reach out to ACBHD QA if you have any questions regarding the requirements related to these areas.

Additionally, we invite you to attend monthly Brown Bag meetings where these and other issues are clarified. Brown Bag meeting invitations can be found on the [QA Training](#) webpage on the Provider website. For questions, please contact [QATA@acgov.org](mailto:QATA@acgov.org).