

- MEMORANDUM -

DATE: December 16, 2021
TO: ACBH Contracted Substance Use Disorder (SUD) Providers
FROM: Torfeh Rejali, LMFT ACBH Quality Assurance (QA) Administrator *Torfeh Rejali*
SUBJECT: **SUD InSyst Episode Closing Date During the Public Health Emergency**

The purpose of this memo is to provide information to the ACBH SUD treatment network regarding the *InSyst Episode Closing Date* during the Public Health Emergency. This memo primarily applies to those SUD providers that complete their clinical documentation in Clinician's Gateway (CG) SUD. SUD providers that do not use CG for claiming (e.g. Opioid Treatment Programs) may also follow the instructions in this memo, if applicable.

Background

Currently, based on CalOMS discharge date data collection requirements, SUD providers must use the date of the last contact (e.g. face-to-face, telehealth, or telephone) with a beneficiary as the *InSyst Episode Closing Date*. This creates a challenge within the ACBH system, as no claims or clinical documentation can be submitted with a service date after the *InSyst Episode Closing Date*.

For providers that are contractually obligated to complete their SUD clinical documentation in Clinician's Gateway SUD, this means that they are unable to document any activity that occurs following the beneficiary's last contact into the CG system. Examples include the following:

- SUD Discharge Summaries, required to be completed up to thirty (30) days after contact is lost with a beneficiary
- Non-billable documentation after contact is lost (e.g. attempts to contact/re-engage the beneficiary)
- Billable services completed after last contact, but prior to the provider's knowledge that the beneficiary has disengaged from services. For example, case management services or collateral services after an individual counseling session.

Temporary Solution

As a temporary solution, ACBH has received permission from Department of Health Care Services (DHCS) to use a later date for the *CalOMS Discharge Date* (and thus the *InSyst Episode Closing Date*) during the Public Health Emergency. During this time, the *InSyst Episode Closing Date* may be no later than thirty (30) days from the last contact date with the beneficiary (e.g. in-person, telephone, or telehealth). Additionally, the actual InSyst episode must be closed no later than forty-five (45) days from the last contact date with the beneficiary (e.g. in-person, telephone, or telehealth). Episodes not closed within forty-five (45) days will appear on the provider's InSyst 119 Report and may result in non-compliance with contractual obligations.





Upon the official conclusion of the Public Health Emergency, providers will be required to follow the established rules regarding *CalOMS Discharge Dates* and return to using the last date of contact (in-person, telephone, telehealth) with the beneficiary as the *InSyst Episode Closing Date*. In the meantime, ACBH will continue to work on a more permanent solution.

For questions related to this memo, please contact the *Quality Assurance Department* at qata@acgov.org.

