

Nevada County Mental Health Services
FY 19/20 Specialty Mental Health Triennial Review
Corrective Action Plan

Chart Review

Requirement

MEDICAL NECESSITY

DHCS Finding #1

The actual interventions documented in the progress notes did not meet medical necessity criteria since the interventions were not reasonably likely to result in at least one of the following: a) significantly diminish the impairment; b) prevent deterioration in an important area of life functioning; c) allow the child to progress developmentally; d) correct or ameliorate the mental health condition of a beneficiary who is under age 21. Specifically: No documentation of another valid service provided and documentation was discussion of case in supervision

Corrective Action Description

Nevada County Behavioral Health will require documentation training of all current NCBH staff yearly and for any newly hired NCBH staff. NCBH will require all Medi-Cal contractors to implement yearly documentation trainings for all current staff and any new staff. NCBH will require the contractors to submit evidence of this training and the training will be approved by NCBH. This training will include all regulations and requirements for Medi-Cal documentation and specifically concerning documentation of and assessment of Medical Necessity criteria as outlined in this finding: interventions likely to result in at least one of the following: a) significantly diminish the impairment; b) prevent deterioration in an important area of life functioning; c) allow the child to progress developmentally; d) correct or ameliorate the mental health condition of a beneficiary who is under age 21; and documentation of invalid services. The contractors will be required to submit evidence of their staff training to NCBH through staff sign in sheets and quarterly emails.

Proposed Evidence/Documentation of Correction

Nevada County Behavioral Health will provide a copy of the documentation training that is required of all current and new NCBH staff. NCBH will also provide a list of the NCBH staff and contractor staff that have completed this training. Since this is an ongoing training that is provided to the staff of NCBH and the staff of the contractors, the list of staff for both NCBH and the contractors will be submitted to the QA Manager quarterly.

Measures of Effectiveness

The NCBH QA Manager or designee review the NCBH training log quarterly as well as review receipt of emails from contractors. These trainings will be documented on a QA CAP log.

Implementation Timeline

Implementation of this CAP finding will be will begin by 1/4/2021 and completion of this finding will be April 1, 2021.

Requirement

Medical Necessity

DHCS Finding #2

The interventions documented on the progress notes did not meet medical necessity since the service provided was solely transportation, clerical or payee related.

Corrective Action Description

Nevada County Behavioral Health will require documentation training of all current NCBH staff yearly and for any newly hired NCBH staff. NCBH will require all Medi-Cal contractors to implement yearly documentation trainings for all current staff and any new staff. NCBH will require the contractors to submit evidence of this training and the training will be approved by NCBH. This training will include all regulations and requirements for Medi-Cal documentation and specifically concerning documentation of invalid services such as solely transportation, clerical or payee related interventions. The contractors will be required to submit evidence of their staff training to NCBH through staff sign in sheets and quarterly emails.

Proposed Evidence/Documentation of Correction

Nevada County Behavioral Health will provide a copy of the documentation training that is required of all current and new NCBH staff. NCBH will also provide a list of the NCBH staff and contractor staff that have completed this training. Since this is an ongoing training that is provided to the staff of NCBH and the staff of the contractors, the list of staff for both NCBH and the contractors will be submitted to the QA Manager quarterly.

Measures of Effectiveness

The NCBH QA Manager or designee will review the NCBH training log quarterly as well as review receipt of emails from contractors. This information will be documented on a QA CAP log.

Implementation Timeline

Implementation of this CAP finding will begin by 1/4/2021 and completion of this finding will be by 4/1/2021.

Requirement

Assessment

DHCS Finding #3

Assessments were not completed in accordance with regulatory and contractual requirements, specifically: Nevada County Behavioral Health's policy (revised in 2018) states that assessments are updated every year for children and every three years for adults (this was changed from every 5 years to every 3 years in 2018). The following are specific findings from the chart sample: The prior Assessment was completed on 3/18/2015, however, the updated Assessment was not completed until 5/7/2019.

Corrective Action Description

Nevada County Behavioral Health will require documentation training of all current NCBH staff yearly and for any newly hired NCBH staff. This training will include the timeline for assessments for both adults (every 3 years) and children (every year) for NCBH clients. This training will include all regulations and requirements for Medi-Cal documentation and specifically concerning documentation assessments and the timeline for these assessments as required by the NCBH policy. Staff will also be reminded at a monthly all staff meeting of these requirements. NCBH Medi-Cal contractors will be reminded of this requirement through monthly contract provider meeting and/or emails. NCBH Medi-Cal contracted providers will follow their agency timelines for assessments and reassessments.

Proposed Evidence/Documentation of Correction

Nevada County Behavioral Health will provide a copy of the documentation training that is required of all current and new NCBH staff that will include the information of this finding. NCBH will provide copies of the All Staff Meeting agendas and the Monthly Contractor Meeting agendas where this finding will be addressed. A copy of the email reminder that is sent to the contract providers will be submitted as well.

Measures of Effectiveness

The NCBH QA Manager or designee will review the All Staff Meeting Agenda, the Monthly Providers Meeting agenda as well as the emails that are sent to the contracted providers. The results of this finding will be documented on a QA CAP log.

Implementation Timeline

Implementation of this CAP finding will be will begin 1/4/2021 and completion of this finding will be by 4/1/2021

Requirement

Assessment

DHCS Finding #4

One or more of the assessments reviewed did not address all of the required elements specified in the MHP Contract. Specifically:

- a) Presenting Problem:
- b) Relevant conditions and psychosocial factors affecting the beneficiary's physical health and mental health, including history of or exposure to trauma:
- c) Mental Health History:
- d) Medications:
- e) Substance Exposure/Substance Use
- f) Client Strengths:
- g) Risks:
- h) A mental status examination:

Corrective Action Description

Nevada County Behavioral Health will require documentation training of all current NCBH staff yearly and for any newly hired NCBH staff. NCBH will require all Medi-Cal contractors to implement yearly documentation trainings for all current staff and any new staff. NCBH will require the contractors to submit evidence of this training and the training will be approved by NCBH. This training will include all regulations and requirements for Medi-Cal documentation and specifically concerning documentation of the required elements of an assessment. The contractors will be required to submit evidence of their staff training to NCBH through staff sign in sheets and quarterly emails.

Proposed Evidence/Documentation of Correction

Nevada County Behavioral Health will provide a copy of the documentation training that is required of all current and new NCBH staff. NCBH will also provide a list of the NCBH staff and contractor staff that have completed this training. Since this is an ongoing training that is provided to the staff of NCBH and the staff of contractors, the list will be submitted to the QA Manager quarterly.

Measures of Effectiveness

The NCBH QA Manager or designee will review the All Staff Meeting Agenda, the Monthly Providers Meeting agenda as well as the emails that are sent to the contracted providers. This information will be documented on a QA CAP log.

Implementation Timeline

Implementation of this CAP finding will be will begin by 1/4/2021 and completion of this finding will be by 4/1/2021

Requirement

Medical Consent

DHCS Finding #5

Written medication consents didn't contain all required elements specified in the MHP Contract with the Department. The following required elements were not documented on the medication consent form, and/or documented to have been reviewed with the beneficiary, and/or provided in accompanying written materials to the beneficiary: reason for taking each medication; Reasonable alternative treatments available, if any; Method of administration (oral or injection); Duration of taking each medication; Probable side effects; Possible side effects if taken longer than 3 months; Consent once given may be withdrawn at any time.

Corrective Action Description

Nevada County Behavioral Health will require all NCBH staff and contract provider staff that prescribe or review medications for clients to be trained on the use and disclosure of the NCBH Medication Consent form that is to be reviewed with all clients prescribed medications. This training will include all regulations and requirements for Medi-Cal documentation specifically concerning documentation of the required elements of a Medication Consent form as set forth in this finding. All NCBH Medi-Cal provider contractors will be furnished a copy of the NCBH Medication Consent to be used by their practitioners. Chart reviews of both the NCBH charts and the charts of the contracted providers will ascertain if this Medication Consent form is being provided to the clients. If contractors choose not to use the NCBH Medication Consent document, then the contractors Medication Consent document will contain all the required elements and correspond to the NCBH document.

Proposed Evidence/Documentation of Correction

Nevada County Behavioral Health will provide a copy of the training that is required of all current and new NCBH and contracted provider medication staff as well as a copy of the Medication Consent Form to be used. Since this is an ongoing training that is provided to the medication staff of NCBH and contractors, the list of medication staff that have completed this training will be submitted to the QA Manager twice a year.

Measures of Effectiveness

The NCBH QA Manager or designee will review the results of chart reviews to ensure compliance with this finding. This information will be documented on a QA CAP log.

Implementation Timeline

Implementation of this CAP finding will begin by 1/4/2021 and completion of this finding will be 4/1/2021.

Requirement

Medical Consent

DHCS Finding #6

Medication Consent(s) in the chart sample did not include the signature of the provider of service (or electronic equivalent) that includes the provider's professional degree, licensure, job title, and/or the date the provider completed and entered the document into the medical record. Specifically: type of professional degree, licensure, or job title of person providing the service.

Corrective Action Description

Nevada County Behavioral Health will require all NCBH staff and contract provider staff that prescribe or review medications for clients to be trained on the use and disclosure of the NCBH Medication Consent form that is to be reviewed with all clients prescribed medications. This training will include all regulations and requirements for Medi-Cal documentation specifically concerning documentation of the required elements of the Medication Consent form to include type of professional degree, licensure or job title of person providing the service. All NCBH Medi-Cal provider contractors will be furnished a copy of the NCBH Medication Consent to be used by their practitioners. Chart reviews of both the NCBH charts and the charts of the contracted providers will ascertain if this Medication Consent form is being provided to the clients. Contractor directors and/or QA staff will be emailed a copy of the Medication Consent. If contractors choose not to use the NCBH Medication Consent document, then the contractors Medication Consent document will contain all the required elements and correspond to the NCBH document.

Proposed Evidence/Documentation of Correction

Nevada County Behavioral Health will provide a copy of the training that is required of all current and new NCBH and contracted provider medication staff as well as a copy of the Medication Consent Form to be used. Since this is an ongoing training that is provided to the medication staff of NCBH and contractors, the list of medication staff that have completed this training will be submitted to the QA Manager twice a year.

Measures of Effectiveness

The NCBH QA Manager or designee will review the results of chart reviews to ensure compliance with this finding. This information will be documented on a QA CAP log.

Implementation Timeline

Implementation of this CAP finding will be will begin by 1/4/2021 and completion of this finding will be 4/1/2021.

Requirement

Client Plan

DHCS Finding #7

The medical record did not include services that were sufficient to adequately “achieve the purpose for which the services are furnished”. Specifically: current Client Plan did not contain services sufficient to reasonably achieve the purpose and goals documented on the Plan. Client presented with significant safety concerns; the client plan did not contain any interventions to address suicidal ideation and safety.

Corrective Action Description

Nevada County Behavioral Health will require documentation training of all current NCBH staff yearly and for any newly hired NCBH staff on the development of Client Plans. NCBH will require all Medi-Cal contractors to implement yearly documentation trainings for all current staff and any new staff on the development of Client Plans. NCBH will require the contractors to submit evidence of this training and the training will be approved by NCBH. This training will include all regulations and requirements for Medi-Cal documentation and specifically concerning documentation of the required elements of a Client Plan to include interventions for the client so the client can reasonably attain the purpose and goals of the plan. Chart reviews of both the NCBH charts and the charts of the contracted providers will ascertain if the Client Plans contain the documentation necessary to comply with this finding (sufficient services to help client achieve the goals related to the furnished services). The contractors will be

required to submit evidence of their staff training to NCBH through staff sign in sheets and quarterly emails.

Proposed Evidence/Documentation of Correction

Nevada County Behavioral Health will provide a copy of the documentation training that is required of all current and new NCBH staff. NCBH will also provide a list of the NCBH staff and contractor staff that have completed this training. Since this is an ongoing training that is provided to the staff of NCBH and the staff of contractors, the list will be submitted to the QA Manager quarterly.

Measures of Effectiveness

The NCBH QA Manager or designee will review the results of chart reviews to ensure compliance with this finding. This information will be documented on a QA CAP log.

Implementation Timeline

Implementation of this CAP finding will begin by 1/4/2021 and completion of this finding will be 4/1/2021,

Requirement

Client Plan

DHCS Finding #8

Client Plans were not completed prior to the delivery of planned services and/or were not updated at least annually or reviewed and updated when there was a significant change in the beneficiary's condition (as required in the MHP Contract with the Department and/or as specified in the MHP's documentation standards). Specifically: no Client Plan for one or more type of claimed service; TBS Services were provided with no specific intervention for TBS on the client plan or a separate client plan.

Corrective Action Description

Nevada County Behavioral Health will require documentation training of all current NCBH staff yearly and for any newly hired NCBH staff on the development of Client Plans. NCBH will require all Medi-Cal contractors to implement yearly documentation trainings for all current staff and any new staff on the development of Client Plans. NCBH will require the contractors to submit evidence of this training and the training will be approved by NCBH. This training will include all regulations and requirements for Medi-Cal documentation and specifically concerning timeliness of the Client Plan updates and the client plans will correspond with all types of claimed services to include TBS services. Chart reviews of both the NCBH charts and the charts of the contracted providers will ascertain if the Client Plans contain the documentation necessary to

comply with this finding. The contractors will be required to submit evidence of their staff training to NCBH through staff sign in sheets and quarterly emails.

Proposed Evidence/Documentation of Correction

Nevada County Behavioral Health will provide a copy of the documentation training that is required of all current and new NCBH staff. NCBH will also provide a list of the NCBH staff and contractor staff that have completed this training. Since this is an ongoing training that is provided to the staff of NCBH and the staff of contractors, the list will be submitted to the QA Manager quarterly.

Measures of Effectiveness

The NCBH QA Manager or designee will review the results of chart reviews to ensure compliance with this finding. This information will be documented on a QA CAP log.

Implementation Timeline

Implementation of this CAP finding will begin by 1/4/2021 and completion of this finding will be 4/1/2021.

Requirement

Client Plan

DHCS Finding #9

Client Plans were not completed prior to the delivery of planned services and/or were not updated at least annually or reviewed and updated when there was a significant change in the beneficiary's condition (as required in the MHP Contract with the Department and/or as specified in the MHP's documentation standards). Specifically: no Client Plan for one or more type of claimed service; TBS Services were provided with no specific intervention for TBS on the client plan or a separate client plan.

Corrective Action Description

Nevada County Behavioral Health will require documentation training of all current NCBH staff yearly and for any newly hired NCBH staff on the development of Client Plans. NCBH will require all Medi-Cal contractors to implement yearly documentation trainings for all current staff and any new staff on the development of Client Plans. NCBH will require the contractors to submit evidence of this training and the training will be approved by NCBH. This training will include all regulations and requirements for Medi-Cal documentation and specifically concerning timeliness of the Client Plan updates and the client plans will correspond with all types of claimed services to include TBS services. Chart reviews of both the NCBH charts and the charts of the contracted providers will ascertain if the Client Plans contain the documentation necessary to comply with this finding. The contractors will be required to submit evidence of their staff training to NCBH through staff sign in sheets and quarterly emails.

Proposed Evidence/Documentation of Correction

Nevada County Behavioral Health will provide a copy of the documentation training that is required of all current and new NCBH staff. NCBH will also provide a list of the NCBH staff and contractor staff that have completed this training. Since this is an ongoing training that is provided to the staff of NCBH and the staff of contractors, the list will be submitted to the QA Manager quarterly.

Measures of Effectiveness

The NCBH QA Manager or designee will review the results of chart reviews to ensure compliance with this finding. This information will be documented on a QA CAP log.

Implementation Timeline

Implementation of this CAP finding will be will begin by 1/4/2021 and completion of this finding will be 4/1/2021.

Requirement

Client Plan

DHCS Finding #10

One or more client plan(s) was not updated at least annually and/or when there were significant changes in the beneficiary's condition. Specifically: there was a lapse between the prior and current Client Plans.

Corrective Action Description

Nevada County Behavioral Health will require documentation training of all current NCBH staff yearly and for any newly hired NCBH staff on the development of Client Plans. NCBH will require all Medi-Cal contractors to implement yearly documentation trainings for all current staff and any new staff on the development of Client Plans. NCBH will require the contractors to submit evidence of this training and the training will be approved by NCBH. This training will include all regulations and requirements for Medi-Cal documentation and specifically concerning documentation of the required elements of a Client Plan to include interventions for the client so the client can reasonably attain the purpose and goals of the plan. Chart reviews of both the NCBH charts and the charts of the contracted providers will ascertain if the Client Plans contain the documentation necessary to comply with this finding (sufficient services to help client achieve the goals related to the furnished services). The contractors will be required to submit evidence of their staff training to NCBH through staff sign in sheets and quarterly emails.

Proposed Evidence/Documentation of Correction

Nevada County Behavioral Health will provide a copy of the documentation training that is required of all current and new NCBH staff. NCBH will also provide a list of the NCBH staff and contractor staff that have completed this training. Since this is an ongoing training that is provided to the staff of NCBH and the staff of contractors, the list will be submitted to the QA Manager quarterly

Measures of Effectiveness

The NCBH QA Manager or designee will review the results of chart reviews to ensure compliance with this finding. This information will be documented on a QA CAP log.

Implementation Timeline

Implementation of this CAP finding will begin by 1/4/2021 and completion of this finding will be 4/1/2021.

Requirement

Client Plan

DHCS Finding #11

Client Plans were not completed prior to the delivery of planned services and/or were not updated at least annually or reviewed and updated when there was a significant change in the beneficiary's condition (as required in the MHP Contract with the Department and/or as specified in the MHP's documentation standards). Specifically: no Client Plan for one or more type of claimed service; TBS Services were provided with no specific intervention for TBS on the client plan or a separate client plan.

Corrective Action Description

Nevada County Behavioral Health will require documentation training of all current NCBH staff yearly and for any newly hired NCBH staff on the development of Client Plans. NCBH will require all Medi-Cal contractors to implement yearly documentation trainings for all current staff and any new staff on the development of Client Plans. NCBH will require the contractors to submit evidence of this training and the training will be approved by NCBH. This training will include all regulations and requirements for Medi-Cal documentation and specifically concerning timeliness of the Client Plan updates and the client plans will correspond with all types of claimed services to include TBS services. Chart reviews of both the NCBH charts and the charts of the contracted providers will ascertain if the Client Plans contain the documentation necessary to comply with this finding. The contractors will be required to submit evidence of their staff training to NCBH through staff sign in sheets and quarterly emails.

Proposed Evidence/Documentation of Correction

Nevada County Behavioral Health will provide a copy of the documentation training that is required of all current and new NCBH staff. NCBH will also provide a list of the NCBH staff and contractor staff that have completed this training. Since this is an ongoing training that is provided to the staff of NCBH and the staff of contractors, the list will be submitted to the QA Manager quarterly.

Measures of Effectiveness

The NCBH QA Manager or designee will review the results of chart reviews to ensure compliance with this finding. This information will be documented on a QA CAP log.

Implementation Timeline

Implementation of this CAP finding will begin by 1/4/2021 and completion of this finding will be 4/1/2021.

Requirement

Client Plan

DHCS Finding #12

One or more client plan(s) was not updated at least annually and/or when there were significant changes in the beneficiary's condition. Specifically: there was a lapse between the prior and current Client Plans.

Corrective Action Description

Nevada County Behavioral Health will require documentation training of all current NCBH staff yearly and for any newly hired NCBH staff on the development of Client Plans. NCBH will require all Medi-Cal contractors to implement yearly documentation trainings for all current staff and any new staff on the development of Client Plans. NCBH will require the contractors to submit evidence of this training and the training will be approved by NCBH. This training will include all regulations and requirements for Medi-Cal documentation and specifically concerning timeliness of the initial Client Plan as well as any client plan updates. Chart reviews of both the NCBH charts and the charts of the contracted providers will ascertain if the Client Plans contain the documentation necessary to comply with this finding. The contractors will be required to submit evidence of their staff training to NCBH through staff sign in sheets and quarterly emails.

Proposed Evidence/Documentation of Correction

Nevada County Behavioral Health will provide a copy of the documentation training that is required of all current and new NCBH staff. NCBH will also provide a list of the NCBH staff and contractor staff that have completed this training. Since this is an

ongoing training that is provided to the staff of NCBH and the staff of contractors, the list will be submitted to the QA Manager quarterly.

Measures of Effectiveness

The NCBH QA Manager or designee will review the results of chart reviews to ensure compliance with this finding. This information will be documented on a QA CAP log.

Implementation Timeline

Implementation of this CAP finding will begin by 1/4/2021 and completion of this finding will be 4/1/2021.

Requirement

Client Plan

DHCS Finding #13

Client Plans did not include all of the required elements specified in the MHP Contract. Specifically: one or more proposed intervention did not include an expected frequency or frequency range that was specific enough.

The Client Plan has multiple interventions with a frequency of “ad hoc”. Client Plans did not contain a target date or duration for the goal, objective, nor interventions; client plans that had a target date on the goal or objective, however, the interventions listed do not indicate a specific duration of time. One or more proposed intervention did not include an expected duration.

Corrective Action Description

Nevada County Behavioral Health will require documentation training of all current NCBH staff yearly and for any newly hired NCBH staff on the development of Client Plans. NCBH will require all Medi-Cal contractors to implement yearly documentation trainings for all current staff and any new staff on the development of Client Plans. NCBH will require the contractors to submit evidence of this training and the training will be approved by NCBH. This training will include all regulations and requirements for Medi-Cal documentation and specifically concerning the frequency/frequency range of goals, target dates or duration of goals, interventions for all Client Plans. Client Plan will contain all the required Medi-Cal specifics related to client goals duration, target dates, duration of the goal/objective and specific duration of time for the interventions. Chart reviews of both the NCBH charts and the charts of the contracted providers will ascertain if the Client Plans contain the documentation necessary to comply with this finding. The contractors will be required to submit evidence of their staff training to NCBH through staff sign in sheets and quarterly emails.

Proposed Evidence/Documentation of Correction

Nevada County Behavioral Health will provide a copy of the documentation training that is required of all current and new NCBH staff. NCBH will also provide a list of the NCBH staff and contractor staff that have completed this training. Since this is an ongoing training that is provided to the staff of NCBH and the staff of contractors, the list will be submitted to the QA Manager quarterly.

Measures of Effectiveness

This information will be documented on a QA CAP log.

Implementation Timeline

Implementation of this CAP finding will be will begin by 1/4/2021 and completion of this finding will be 4/1/2021.