FISCAL YEAR (FY) 2015/2016 ANNUAL REVIEW OF CONSOLIDATED SPECIALTY MENTAL HEALTH SERVICES AND OTHER FUNDED SERVICES MADERA COUNTY MENTAL HEALTH PLAN REVIEW November 16, 2015 FINAL FINDINGS REPORT

Section K, "Chart Review - Non-Hospital Services

The medical records of five (5) adult and five (5) child/adolescent Medi-Cal specialty mental health beneficiaries were reviewed for compliance with state and federal regulations; adherence to the terms of the contract between the MADERA County Mental Health Plan (MHP) and the California Department of Health Care Services (DHCS), and for consistency with the MHP's own documentation standards and policies and procedures regarding medical records documentation. The process included a review of <u>121</u> claims submitted for the months of January, February and March of 2015.

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COUNTY: MADERA Medical Necessity

	PROTOCOL REQUIREMENTS				
1.	Does the beneficiary meet all three (3) of the following medical necessity criteria for reimbursement (1a, 1b, and 1c. below)?				
1a.	The beneficiary has a current ICD diagnosis which is included for non-hospital SMHS in accordance with the MHP contract?				
1b.	The beneficiary, as a result of a mental disorder or emotional disturbance listed in 1a, must have at least one (1) of the following criteria (1-4 below): 1) A significant impairment in an important area of life functioning.				
	2) A probability of significant deterioration in an important area of life functioning.				
	3) A probability that the child will not progress developmentally as individually appropriate.				
	 For full-scope MC beneficiaries under the age of 21 years, a condition as a result of the mental disorder or emotional disturbance that SMHS can correct or ameliorate. 				
	 Do the proposed and actual intervention(s) meet the intervention criteria listed below: 1) The focus of the proposed and actual intervention(s) is to address the condition identified in No. 1b. (1-3) above, or for full-scope MC beneficiaries under the age of 21 years, a condition as a result of the mental disorder or emotional disturbance that SMHS can correct or ameliorate per No. 1b(4). 				
	2) The expectation is that the proposed and actual intervention(s) will do at least one (1) of the following (A, B, C, or D):				
	 A. Significantly diminish the impairment. B. Prevent significant deterioration in an important area of life functioning. C. Allow the child to progress developmentally as individually appropriate. D. For full-scope MC beneficiaries under the age of 21 years, correct or ameliorate the condition. 				
1d.	The condition would not be responsive to physical health care based treatment.				
• (CCR, title 9, chapter 11, section 1830.205 (b)(c) CCR, title 9, chapter 11, section 1840.314(d) CCR, title 9, chapter 11, section 1840.314(d) CCR, title 22, chapter 3, section 51303(a) CCR, title 9, chapter 11, section 1840.314(d) CCR, title 9, chapter 3, section 51303(a) Credentialing Boards for MH Disciplines 				

Reasons for Recoupment (RR): Refer to the enclosed Recoupment Summary for additional details concerning disallowances

- RR1. Documentation in the medical record does not establish that the beneficiary has a diagnosis contained in California Code of Regulations, (CCR), title 9, chapter 11, section 1830.205(b)(1)(A-R).
- RR2. Documentation in the medical record does not establish that, as a result of a mental disorder listed in CCR, title 9, chapter 11, section 1830.205(b)(1)(A-R), the beneficiary has, at least, one of the identified functional impairments.
- RR3. Documentation in the medical record does not establish that the focus of the proposed intervention is to address the functional impairment identified in CCR, title 9, chapter 11, section 1830.205(b)(2)
- RR4. Documentation in the medical record does not establish the expectation that the proposed intervention will do, at least, one of the following:
 - a) Significantly diminish the impairment;
 - b) Prevent significant deterioration in an important area of life functioning;
 - c) Allow the child to progress developmentally as individually appropriate; or
 - d) For full-scope Medi-Cal beneficiaries under the age of 21 years, correct or ameliorate the condition.

FINDING 1c-2:

COUNTY: MADERA

The medical record associated with the following Line number did not meet the medical necessity criteria since there was no expectation that the documented intervention would meet the intervention criteria as specified in the CCR, title 9, chapter 11, section 1830.205(b)(3)(B)(1-4):

• 1. RR4, refer to Recoupment Summary for details

PLAN OF CORRECTION 1c-2:

The MHP shall submit a POC that indicates how the MHP will ensure that the interventions provided meet the intervention criteria specified in CCR, title 9, chapter 11, section 1830.205(b)(3)(B)(1-4).

Assessment (Findings in this area do not result in disallowances. Plan of Correction only.)

	PROTOCOL REQUIREMENTS				
2.	Regarding the Assessment, are the following conditions met:			s met:	
2a.	1) Has the Assessment been completed in accordance with the MHP's established written documentation standards for timeliness?				
	2) Has the Assessment been completed in accordance with the MHP's established written				
	documentation standards for frequency?				
• (CCR, title 9, chapter 11, section 1810.204 CCR, title 9, chapter 4, section 851- Lanterman-Petris Act				
• (CCR, title 9, chapter 11, section 1840.112(b)(1-4) MHP Contract, Exhibit A, Attachment I				
• (• CCR, title 9, chapter 11, section 1840.314(d)(e)				

PROTOCOL REQUIREMENTS

- 2b. Do the Assessments include the areas specified in the MHP Contract with the Department?
 - 1) Presenting Problem. The beneficiary's chief complaint, history of presenting problem(s) including current level of functioning, relevant family history and current family information;
 - Relevant conditions and psychosocial factors affecting the beneficiary's physical health and mental health including, as applicable; living situation, daily activities, social support, cultural and linguistic factors, and history of trauma or exposure to trauma;
 - 3) Mental Health History. Previous treatment, including providers, therapeutic modality (e.g., medications, psychosocial treatments) and response, and inpatient admissions. If possible, include information from other sources of clinical data such as previous mental health records and relevant psychological testing or consultation reports;
 - 4) Medical History. Relevant physical health conditions reported by the beneficiary or a significant support person. Include name and address of current source of medical treatment. For children and adolescents the history must include prenatal and perinatal events and relevant/significant developmental history. If possible, include other medical information from medical records or relevant consultation reports
 - 5) Medications. Information about medications the beneficiary has received, or is receiving, to treat mental health and medical conditions, including duration of medical treatment. The assessment must include documentation of the absence or presence of allergies or adverse reactions to medications and documentation of an informed consent for medications;

¹ Line number removed for confidentiality

6)		st and present use of tobacco, alcohol, caffeine, CAM ons) and over-the-counter drugs, and illicit drugs;
7)		eneficiary's strengths in achieving client plan goals needs and functional impairments as a result of the
8)	Risks. Situations that present a risk to the trauma;	beneficiary and/or others, including past or current
9)	A mental status examination;	
10	, ,	the current ICD-code must be documented, nistory, mental status examination and/or other clinical oses.
• CCR, title	9, chapter 11, section 1810.204 9, chapter 11, section 1840.112(b)(1-4)	 CCR, title 9, chapter 4, section 851- Lanterman-Petris Act MHP Contract, Exhibit A, Attachment I

FINDING 2b:

One or more of the assessments reviewed did not include all of the elements specified in the MHP Contract with the Department. The following required elements were incomplete or missing:

1) Medications: 2

2) Risks: ³

PLAN OF CORRECTION 2b:

The MHP shall submit a POC that indicates how the MHP will ensure that every assessment contains all of the required elements specified in the MHP Contract with the Department.

	PROTOCOL REQUIREMENTS			
2c.	2c. Does the assessment include:			
	1) The date of service?			
	2) The signature of the person providing the service (or electronic equivalent); the person's type of			
	professional degree, and licensure or job title?			
	The date the documentation was entered in the medical record?			
•	CCR, title 9, chapter 11, section 1810.204 CCR, title 9, chapter 4, section 851- Lanterman-Petris Act			
•	CCR, title 9, chapter 11, section 1840.112(b)(1-4)	MHP Contract, Exhibit A, Attachment I		
•	• CCR, title 9, chapter 11, section 1840.314(d)(e)			

FINDING 2c:

The Assessment did not include:

² Line number removed for confidentiality

³ Line number removed for confidentiality

1) Signature of the person providing the service (or electronic equivalent) that includes the person's professional degree, licensure, or job title: ⁴

PLAN OF CORRECTION 2c:

The MHP shall submit a POC that indicates how the MHP will ensure that all documentation includes:

- 1) The signature or (electronic equivalent) with the professional degree, licensure or title of the person providing the service.
- 2) The date the signature was completed and the document was entered into the medical record.

Medication Consent (Findings in this area do not result in disallowances. Plan of Correction only.)

	PROTOCOL REQUIREMENTS				
3.	3. Regarding medication consent forms:				
3a.	3a. Did the provider obtain and retain a current written medication consent form signed by the beneficiary agreeing to the administration of each prescribed psychiatric medication?				
•	CCR, title 9, chapter 11, section 1810.204 CCR, title 9, chapter 4, section 851- Lanterman-Petris Act				
•	CCR, title 9, chapter 11, section 1840.112(b)(1-4) MHP Contract, Exhibit A, Attachment I				
•	• CCR, title 9, chapter 11, section 1840.314(d)(e)				

	PROTOCOL REQUIREMENTS			
3b.	b. Does the medication consent for psychiatric medications include the following required elements:			
	1)	The reasons for taking such medications?		
	2)	Reasonable alternative treatments available, if any?		
	3)	Type of medication?		
	4)	Range of frequency (of administration)?		
	5) Dosage?			
	6) Method of administration?			
	7) Duration of taking the medication?			
	8) Probable side effects?			
	9) Possible side effects if taken longer than 3 months?			
	10) Consent once given may be withdrawn at any time?			
• (CCR, title 9, chapter 11, section 1810.204 CCR, title 9, chapter 4, section 851- Lanterman-Petris Act CCR, title 9, chapter 11, section 1840.112(b)(1-4) CCR, title 9, chapter 4, section 851- Lanterman-Petris Act MHP Contract, Exhibit A, Attachment I 			

FINDING 3b:

Written medication consents did not contain all of the required elements specified in the MHP Contract with the Department. The following required elements were not documented on the medication consent forms found in the beneficiary's medical record:

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⁴ Line number removed for confidentiality

- 1) Range of frequency: 5
- 2) Dosage: 6
- **3)** Method of administration (oral or injection): ⁷
- 4) Duration of taking each medication: 8
- 5) Possible side effects if taken longer than 3 months: 9
- 6) Consent once given may be withdrawn at any time: 10

PLAN OF CORRECTION 3b:

The MHP shall submit a POC that indicates how the MHP will ensure that every medication consent includes documentation of all of the required elements specified in the MHP Contract with the Department.

Client Plans

	PROTOCOL REQUIREMENTS				
4b.	b. Does the client plan include the items specified in the MHP Contract with the Department?				
	 Specific, observable, and/or specific quantifiable goals/treatment objectives related to the beneficiary's mental health needs and functional impairments as a result of the mental health diagnosis. 				
	 The proposed type(s) of intervention/modality including a detailed description of the intervention to be provided. 				
	The proposed frequency of intervention(s).				
	4) The proposed duration of intervention(s).				
	 Interventions that focus and address the identified functional impairments as a result of the mental disorder or emotional disturbance. 				
	6) Interventions are consistent with client plan goal(s)/treatment objective(s).				
	7) Be consistent with the qualifying diagnoses.				
• (000 11 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				

FINDING 4b:

The following Line numbers had client plans that did not include all of the items specified in the MHP Contract with the Department:

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⁶ Line number removed for confidentiality

⁷ Line number removed for confidentiality

⁸ Line number removed for confidentiality

⁹ Line number removed for confidentiality

¹⁰ Line number removed for confidentiality

- **4b-2)** One or more of the proposed interventions did not include a detailed description. Instead, only a "type" or "category" of intervention was recorded on the client plan (e.g. "Medication Support Services," "Targeted Case Management," "Mental Health Services," etc.). ¹¹
- **4b-5)** One or more of the proposed interventions did not address the mental health needs and functional impairments identified as a result of the mental disorder. ¹²

PLAN OF CORRECTION 4b:

The MHP shall submit a POC that indicates how the MHP will ensure that:

- 1) (4b-2.) All mental health interventions/modalities proposed on client plans include a detailed description of the interventions to be provided and do not just identify a type or modality of service (e.g. "therapy", "medication", "case management", etc.).
- 2) (4b-5.) All mental health interventions/modalities proposed on client plans address the mental health needs and identified functional impairments of the beneficiary as a result of the mental disorder.

PROTOCOL REQUIREMENTS

- 4d. Regarding the beneficiary's participation and agreement with the client plan:
 - 1) Is there documentation of the beneficiary's degree of participation and agreement with the client plan as evidenced by, but not limited to:
 - a. Reference to the beneficiary's participation in and agreement in the body of the client plan; or
 - b. The beneficiary signature on the client plan; or
 - c. A description of the beneficiary's participation and agreement in the medical record.
 - 2) Does the client plan include the beneficiary's signature or the signature of the beneficiary's legal representative when:
 - a. The beneficiary is expected to be in long-term treatment, as determined by the MHP, and,
 - b. The client plan provides that the beneficiary will be receiving more than one (1) type of SMHS?
 - 3) When the beneficiary's signature or the signature of the beneficiary's legal representative is required on the client plan and the beneficiary refuses or is unavailable for signature, does the client plan include a written explanation of the refusal or unavailability of the signature?
- CCR, title 9, chapter 11, section 1810.205.2
- CCR, title 9, chapter 11, section 1810.254
- CCR, title 9, chapter 11, section 1810.440(c)(1)(2)
- CCR, title 9, chapter 11, section 1840.112(b)(2-5)
- CCR, title 9, chapter 11, section 1840.314(d)(e)
- DMH Letter 02-01, Enclosure A

- WIC, section 5751.2
- MHP Contract, Exhibit A, Attachment I
- CCR, title 16, Section 1820.5
- California Business and Profession Code, Section 4999.20

Reasons for Recoupment (RR): Refer to the enclosed Recoupment Summary for additional details concerning disallowances

RR7. No documentation of beneficiary or legal guardian participation in the plan or written explanation of the beneficiary's refusal or unavailability to sign as required in the MHP Contract with the Department.

¹¹ Line number removed for confidentiality

¹² Line number removed for confidentiality

FINDING 4d-1:

The MHP did not have written documentation standards for the beneficiary's participation in and agreement with the client plan, and for the beneficiary's signature on the client plan. There was no documentation of the beneficiary's or legal representative's degree of participation in and agreement with the plan, and there was no written explanation of the beneficiary's refusal or unavailability to sign the plan, as required in the MHP Contract with the Department:

• 13: The beneficiary or legal representative was required to sign the client plan per the MHP Contract with the Department (i.e., long-term treatment and receiving more than one type of SMHS) / per the MHP's written documentation standards. However, the signature was missing. RR7, refer to Recoupment Summary for details

Furthermore, the MHP did not have a written definition of what constitutes a "long-term" care beneficiary.

PLAN OF CORRECTION 4d:

The MHP shall submit a POC that indicates how the MHP will:

- 1) Ensure that the beneficiary's signature is obtained in a timely manner on the client plan as specified in the MHP Contract with the Department and CCR, title 9, chapter 11, section 1810.440(c)(2)(A)(B).
- 2) Ensure that services are <u>not claimed when the beneficiary's:</u>
 - a) Signature is not obtained when required or not obtained in a timely manner and the reason for refusal is not documented.
- 3) Establish a written definition of what constitutes a "long-term" care beneficiary in its written documentation standards.

	PROTOCOL REQUIREMENTS					
4e.	4e. Is there documentation that the contractor offered a copy of the client plan to the beneficiary?					
	CCR, title 9, chapter 11, section 1810.205.2 CCR, title 9, chapter 11, section 1810.254	•	WIC, section 5751.2 MHP Contract, Exhibit A, Attachment I			
• CCR, title 9, chapter 11, section 1810.440(c)(1)(2)			CCR, title 16, Section 1820.5			
 CCR, title 9, chapter 11, section 1840.112(b)(2-5) CCR, title 9, chapter 11, section 1840.314(d)(e) 			California Business and Profession Code, Section 4999.20			
• 1	DMH Letter 02-01, Enclosure A					

FINDING 4e:

There was no documentation that the beneficiary or legal guardian was offered a copy of the client plan for the following line number: ¹⁴

¹³ Line number removed for confidentiality

¹⁴ Line number removed for confidentiality

COUNTY: MADERA

PLAN OF CORRECTION 4e:

The MHP shall submit a POC that indicates how the MHP will:

- 1) Ensure that there is documentation substantiating that the beneficiary was offered a copy of the client plan.
- Submit evidence that the MHP has an established process to ensure that the beneficiary is offered a copy of the client plan.

Progress Notes

	PROTOCOL REQUIREMENTS				
5a. Do the progress notes document the following:					
	Timely documentation (as determined by the MHP) of relevant aspects of client care, including documentation of medical necessity?				
	2)	·			
	3)				
	4)	4) The date the services were provided?			
	2)	2) Documentation of referrals to community resources and other agencies, when appropriate?			
	3)	3) Documentation of follow-up care or, as appropriate, a discharge summary?			
	4) The amount of time taken to provide services?				
	5) The signature of the person providing the service (or electronic equivalent); the person's type of professional degree, and licensure or job title?				
•		9, chapter 11, section 1810.254 9, chapter 11, section 1810.440(c)	 CCR, title 9, chapter 11, sections 1840.316 - 1840.322 CCR, title 22, chapter 3, section 51458.1 		
•	 CCR, title 9, chapter 11, section 1840.112(b)(2-6) CCR, title 9, chapter 11, section 1840.314 CCR, title 22, chapter 3, section 51470 MHP Contract, Exhibit A, Attachment I 				

Reasons for Recoupment (RR): Refer to the enclosed Recoupment Summary for additional details concerning disallowances

- RR1. Documentation in the medical record does not establish that the beneficiary has a diagnosis contained in California Code of Regulations, (CCR), title 9, chapter 11, section 1830.205(b)(1)(A-R).
- RR2. Documentation in the medical record does not establish that, as a result of a mental disorder listed in CCR, title 9, chapter 11, section 1830.205(b)(1)(A-R), the beneficiary has, at least, one of the identified functional impairments.
- RR3. Documentation in the medical record does not establish that the focus of the proposed intervention is to address the functional impairment identified in CCR, title 9, chapter 11, section 1830.205(b)(2)
- RR4. Documentation in the medical record does not establish the expectation that the proposed intervention will do, at least, one of the following:
 - a) Significantly diminish the impairment;
 - b) Prevent significant deterioration in an important area of life functioning;
 - c) Allow the child to progress developmentally as individually appropriate; or
 - d) For full-scope Medi-Cal beneficiaries under the age of 21 years, correct or ameliorate the condition.

RR9. No progress note was found for service claimed.

- RR10. The time claimed was greater than the time documented.
- RR13 The progress note indicates that the service provided was solely for one of the following:
 - a) Academic educational service:
 - b) Vocational service that has work or work training as its actual purpose;
 - c) Recreation; or
 - d) Socialization that consists of generalized group activities that do not provide systematic individualized feedback to the specific targeted behaviors.
- RR15. The progress note was not signed (or electronic equivalent) by the person(s) providing the service.
- RR16. The progress note indicates the service provided was solely transportation.
- RR17. The progress note indicates the service provided was solely clerical.
- RR18. The progress note indicates the service provided was solely payee related.
- RR19a. No service was provided.
- RR19b.The service was claimed for a provider on the Office of Inspector General List of Excluded Individuals and Entities.
- RR19c.The service was claimed for a provider on the Medi-Cal suspended and ineligible provider list
- RR19d. The service was not provided within the scope of practice of the person delivering the service.

FINDING 5a:

Progress notes were not completed in accordance with regulatory and contractual requirements and/or with the MHP's own written documentation standards

- One or more progress note was not completed within the timeliness and frequency standards in accordance with regulatory and contractual requirements.
- The MHP was not following its own written documentation standards for timeliness of staff signatures on progress notes.
- Progress notes did not document the following:
 - **5a-1)** ¹⁵: Timely documentation of relevant aspects of beneficiary care as specified by the MHP's documentation standards (i.e., progress notes completed late based on the MHP's written documentation standards in effect during the audit period).
 - **5a-3)** ¹⁶: The interventions applied, beneficiary's response to the interventions and the location of the interventions.
 - **5a-4)** ¹⁷: Timeliness of the progress note could not be determined because the note was signed but not dated by the person providing the service. Therefore, the date the progress note was entered into the medical record could not be determined.
 - **5a-8)** ¹⁸: The provider's professional degree, licensure or job title.

¹⁵ Line number removed for confidentiality

¹⁶ Line number removed for confidentiality

¹⁷ Line number removed for confidentiality

¹⁸ Line number removed for confidentiality

COUNTY: MADERA

PLEASE NOTE: The exact same verbiage was recorded on multiple progress notes, and therefore those progress notes were not individualized, did not accurately document the beneficiary's response and the specific interventions applied, as specified in the MHP Contract with the Department for: ¹⁹

PLAN OF CORRECTION:

The MHP shall submit a POC that indicates how the MHP will:

- 1) Ensure that progress notes meet timeliness, frequency and the staff signature requirements in accordance with regulatory and contractual requirements.
- Describe how the MHP will ensure that progress notes are completed in accordance with the timeliness and frequency requirements specified in the MHP's written documentation standards.
- 3) The MHP shall submit a POC that indicates how the MHP will ensure that progress notes document:
 - **5a-1)** Timely completion by the person providing the service and relevant aspects of client care, as specified in the MHP Contract with the Department and the MHP's written documentation standards.
 - **5a-3)** Interventions applied, the beneficiary's response to the interventions and the location of the interventions, as specified in the MHP Contract with the Department.
 - **5a-4)** The date the progress note was completed and entered into the medical record by the person(s) providing the service in order to determine the timeliness of completion, as specified in the MHP Contract with the Department.
 - **5a-8)** The provider's/providers' professional degree, licensure or job title.
- 4) The documentation is individualized for each service provided.

FINDING 5a3:

The progress notes for the following line numbers indicate that the service provided was solely for:

• Clerical: ²⁰. RR17, refer to Recoupment Summary for details.

PLAN OF CORRECTION:

The MHP shall submit a POC that indicates how the MHP will ensure that:

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- 1) Each progress note describes how services provided reduced impairment, restored functioning, or prevented significant deterioration in an important area of life functioning, as outlined in the client plan.
- 2) Services provided and claimed are not solely clerical.
- 3) All services claimed are appropriate, relate to the qualifying diagnosis and identified functional impairments and are medically necessary as delineated in the CCR, title 9, chapter 11, sections 1830.205(a)(b).

	PROTOCOL REQUIREMENTS				
5c.	5c. Timeliness/frequency as follows:				
	1) Every service contact for:				
	A. Mental health services				
	B. Medication support services				
	C. Crisis intervention				
	D. Targeted Case Management				
	2) Daily for:				
	A. Crisis residential				
	B. Crisis stabilization (one per 23/hour period)				
	C. Day treatment intensive				
	3) Weekly for:				
	A. Day treatment intensive (clinical summary)				
	B. Day rehabilitation				
	C. Adult residential				
•	CR, title 9, chapter 11, section 1810.254 • CCR, title 9, chapter 11, sections 1840.316 - 1840.322				
•	• CCR, title 9, chapter 11, section 1810.440(c) • CCR, title 22, chapter 3, section 51458.1				
•	 CCR, title 9, chapter 11, section 1840.112(b)(2-6) CCR, title 9, chapter 11, section 1840.314 CCR, title 22, chapter 3, section 51470 MHP Contract, Exhibit A, Attachment I 				

FINDING 5c:

Documentation in the medical record did not meet the following requirements:

 ²¹: The type of specialty mental health service (SMHS) documented on the progress note was not the same type of SMHS claimed.
 RR9, refer to Recoupment Summary for details.

PLAN OF CORRECTION 5c:

The MHP shall submit a POC that indicates how the MHP will:

- 1) Ensure that all SMHS claimed are:
 - a) Claimed for the correct service modality and billing code.

²¹ Line number removed for confidentiality

	PROTOCOL REQUIREMENTS				
5d.	5d. Do all entries in the beneficiary's medical record include:				
	1) The date of service?				
	2) The signature of the person providing the service (or electronic equivalent); the person's type of				
	professional degree, and licensure or job title?				
	The date the documentation was entered in the medical record?				
•	 CCR, title 9, chapter 11, section 1810.254 CCR, title 9, chapter 11, sections 1840.316 - 1840.322 				
•	 CCR, title 9, chapter 11, section 1810.440(c) CCR, title 22, chapter 3, section 51458.1 				
•	 CCR, title 9, chapter 11, section 1840.112(b)(2-6) CCR, title 22, chapter 3, section 51470 				
•	CCR, title 9, chapter 11, section 1840.314 • MHP Contract, Exhibit A, Attachment I				

FINDING 5d:

The Progress notes did not include:

- Date of service: ²²
- Signature of the person providing the service (or electronic equivalent) that includes the person's professional degree, licensure, or job title: ²³
- Date the documentation was entered into the medical record: 24

PLAN OF CORRECTION 5d:

The MHP shall submit a POC that indicates how the MHP will:

- 1) Ensure that all documentation includes The signature or (electronic equivalent) with the professional degree, licensure or title of the person providing the service.
- 2) Ensure that all documentation includes The date the signature was completed and the document was entered into the medical record.

²² Line number removed for confidentiality

²³ Line number removed for confidentiality

²⁴ Line number removed for confidentiality