

SWMBH MHL Operating Policy 12.3

Subject: Clinical Documentation		Accountability: Clinical/ Compliance	Effective Date: 7/29/14	Pages: 4
REQUIRED BY: BBA Section _____ PIHP Contract Section _____ NCQA/URAC Standard _____ Other _____			Last Reviewed Date: 5/10/17	Past Reviewed Dates: 7/28/15
LINE OF BUSINESS: <input checked="" type="checkbox"/> Specialty Waiver (B/C) <input checked="" type="checkbox"/> 1115 Waiver <input checked="" type="checkbox"/> Healthy Michigan <input checked="" type="checkbox"/> SUD Medicaid <input checked="" type="checkbox"/> SUD CA Block Grant <input checked="" type="checkbox"/> MI Health Link <input type="checkbox"/> OTHER: _____	APPLICATION: <input checked="" type="checkbox"/> SWMBH Staff and Ops <input checked="" type="checkbox"/> Participant CMHSPs <input checked="" type="checkbox"/> SUD Providers <input checked="" type="checkbox"/> MH/DD Providers <input type="checkbox"/> Other: _____		Last Revised Date: 5/10/17	Past Revised Dates: 7/28/15
Approved: <u><i>Winkler</i> 5.10.17</u> Date: <u><i>Ment</i> 5/11/17</u> <u><i>B. K. Bauman</i> 5/11/17</u>		Required Reviewer: Medical Director Director of Provider Network Management and Clinical Improvement Chief Compliance & Privacy Officer Director of UM & ME		

I. Purpose

To ensure all clinical documentation accurately represents services provided and supports the medical necessity of services delivered. Clinical Documentation and progress notes are considered an integral part of supporting medical necessity treatment and as such the documentation must be completed within acceptable timelines based on contractual obligations.

II. Policy

It shall be the policy of Southwest Michigan Behavioral Health (SWMBH) to provide/assure that clinical documentation including progress notes, meets the contractual and regulatory requirements of the Michigan Department of Health and Human Services (MDHHS) contract, Center for Medicare and Medicaid Services (CMS), Code of Federal Regulations (CFR), the Public Health Code, and National Council for Quality Assurance (NCQA) guidelines and standards. This will be demonstrated by each service containing all required elements.

III. Standards and Guidelines

A. Assessments

Clinical assessments will be completed as contractually required based on population of service (SUD, Youth with SED, I/DD, MIA) and shall include all levels of clinical assessment. Standardized assessment tools shall be administered by qualified trained staff only. All initial and annual assessments shall be accessible and available within 30 days of the date of service billed for the assessment.

1. Level II assessments for the Duals Demonstration Project (MI Health Link) shall be completed within 15 days of referral from the ICO. Level II assessments include the population specific tool (American Society of Addiction Medicine (ASAM), Level of

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Care Utilization System (LOCUS), and Supports Intensity Scale (SIS)) which will be completed by SWMBH; and the applicable biopsychosocial assessment, which will be completed by the provider.

2. Primary Assessments shall be completed within 14 days of referral to the service provider.
3. SUD assessments shall include ASAM placement criteria and shall be updated annually, or if resuming services after more than six months out of service.
4. ASAM placement criteria shall be updated when new authorization requests are submitted, and at a minimum of six month intervals.
5. MIA assessments shall include the LOCUS. The LOCUS shall be updated annually within 365 days.
6. SED assessments shall include the Child and Adolescent Functional Assessment Scale (CAFAS) for children ages seven through seventeen years (7-17) and Preschool and Early Childhood Functional Assessment Scale (PECFAS) for ages four through seven (4-7). The CAFAS and PECFAS shall be updated every 3 months and at the time of discharge.
7. Biopsychosocial assessments shall be updated annually within 365 days.
8. The Supports Intensity Scale (SIS) for individuals with I/DD shall be handled according to MDHHS SIS Manual and AAIDD guidelines. The MDHHS SIS Manual indicates completion at least every 3 years. Biopsychosocial assessments for individuals with I/DD shall be updated annually.
9. I/DD initial assessments shall include information from intellectual assessments completed.
10. Assessments specific to Autism benefits shall be administered according to Medicaid Provider Manual Requirements.
11. Standardized functional assessment tools shall be administered by qualified trained staff only.
12. All Initial and annual assessments shall be accessible and available within 30 days of the date of service billed for the assessment unless otherwise specified in assessment-specific material such as MDHHS SIS Manual.
13. All functional assessment tools completed by the Community Mental Health Service Provider (CMHSP) or provider shall be submitted to the SWMBH Data Warehouse in a structured data format within 14 days of completion.

B. Treatment Record Documentation

SWMBH's documentation requirements ensure compliance with contractual and regulatory requirements, as well as NCQA guidelines. SWMBH believes that consistent, current and complete documentation in the treatment record is an essential component of quality member care. All entries into the treatment record are dated and include the responsible clinician/staff's name who provided the service, professional degree, and relevant identification number if applicable. Any handwritten documents must be legible to persons other than the writer. Any changes to a written record must be corrected by drawing a single line through the error and marked as an error, or dated and initialed or an addendum must be completed to reflect any changes. The member's name, or identification number, must be present at the top of each page of clinical documents. SWMBH requires the following content to be present in the treatment record, as applicable:

1. Member's name
2. Member's date of birth
3. Gender
4. Presenting problems, along with relevant and social conditions affecting the

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member's medical and psychiatric status and the results of a mental status exam

5. A medical and psychiatric history, including previous treatment dates, provider identification, therapeutic interventions and responses, sources of clinical data and relevant family information.
 - a. For members 12 and older, documentation should also include past and present use of alcohol and cigarettes, as well as illicit, prescribed and over the counter drugs.
 - b. For child and adolescent members, documentation should contain prenatal and perinatal events, along with a complete developmental history (physical, psychological, social, intellectual and academic).

C. Treatment Planning

1. Medicaid. Treatment planning must occur according to the Michigan Medicaid Provider Manual and MDHHS PCP Guideline for every Member receiving Medicaid funded services on at least an annual basis. It is imperative that all persons charged with implementing Individualized Plans of Service (IPOS) and subsequent addendums are promptly and adequately trained when Plans are developed and when there is a change to the IPOS.
2. Medicare. For individuals receiving SWMBH-funded Medicare services through MI Health Link, services must be based on a written plan of care. The plan of care may be contained in a separate treatment plan document updated at least annually with specific goals and objectives, or documented in progress notes on an ongoing basis in a specifically identified plan statement.

D. Progress Note Documentation

Progress note documentation must correspond to the member's IPOS/plan of care, including current status, progress toward specific goals and objectives addressed during the encounter, and interventions offered by the clinician/staff during the encounter and shall include these mandatory elements:

1. Required content
 - a. Customer's Legal Name
 - b. Diagnosis
2. Service Data
 - a. Service Provided
 - b. Clinician/staff member providing the service
 - c. Clinician/staff member licensure/credentials
 - d. Other persons present during the service (exclusion names of other customers)
 - e. Location or method of delivery (office, home, community, school, long term care facility, hospital, telephone)
 - f. Date of service
 - g. Start and stop time of the encounter (duration)
3. Description of Service
 - a. Presenting problems, treatment modality, customer response to treatment
 - b. Goal(s) and/or objectives of the IPOS addressed
 - c. Member's strengths and limitations in achieving treatment plan goals and objectives
 - d. Treatment interventions that reflect consistency with those goals and objectives
 - e. Progress toward desired outcome or lack thereof
 - f. Current status of the customer
 - g. Future treatment recommendations

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- h. Continuity and coordination of care activities as appropriate
 - i. Dates of follow up appointments or, as applicable, discharge plans are noted
 - j. Specific clinician/staff interventions offered during the service contact
4. Excluded Content
- a. Progress notes for psychotherapy should not include psychotherapy notes as defined under HIPAA in 45 CFR Part 164, subpart E, section 501
 - b. Content from psychotherapy notes that can be included in the record are limited to the following:
 - i. Medication prescription and monitoring
 - ii. Counseling session start and stop times
 - iii. The modality and frequency of treatment provided
 - iv. Results of clinical tests
 - v. Summary of any of the following: diagnoses, functional status, treatment plan, symptoms, prognosis, and/or progress to date
5. Service documentation or progress notes must be completed and be part of the customer record within a reasonable time period after the delivery of the service, and prior to the submission of the claim or encounter.

IV. Definitions

Psychotherapy notes

Notes recorded (in any medium) by a health care provider who is a mental health professional documenting or analyzing the contents of conversation during a private counseling session or a group, joint, or family counseling session and that are separated from the rest of the customer's medical record.

V. References

- A. Medicaid Provider Manual 2.1
- B. MDHHS Protocol C.1.2, C.2.4
- C. 45CFR Part 164, Subpart E, Section 501
- D. Memorandum of Understanding between the Center for Medicare and Medicaid Services and Michigan Department of Community Health Demonstration to Integrate Care for Persons Eligible for Medicare and Medicaid
- E. PIHP/Provider contract
- F. MDHHS Supports Intensity Scale Manual
- G. Affordable Care Act Section 2402(a) Guidance for Implementing Standards for Person Centered Planning and Self Direction in Home and Community Based Services Programs
- H. HCBS Medicaid Program and Community Based Setting Requirements for Community first Choice and HCBS Waivers, 79 FR 2947 January 16 2014

VI. Attachments

- A. None