



SOLANO COUNTY QUALITY ASSURANCE

QA INFORMATION NOTICE 22-11

NOVEMBER 1, 2022

PURPOSE: To inform our Solano County staff, contractors and general community of changes in programs, policies, or procedures at the local, State and Federal levels.

QA Information Notices (INs) are sent out monthly and posted on our [website](#).

GENERAL UPDATES

22-11 (A) CalAIM – CALIFORNIA ADVANCING & INNOVATING MEDI-CAL (COUNTY & CONTRACTOR)

22-11 (A.1) CalAIM IMPLEMENTATION BHQIP UPDATE

The three main areas of CalAIM implementation are guided by goals and milestones set forth in the Behavioral Health Quality Improvement Plan (BHQIP). These three areas are Payment Reform, Documentation/Policy Redesign, and Data Exchange. The deadline for the first set of milestones in each of these goal areas was on September 30, 2022.

At this time, all Behavioral Health Plan (BHP) County owned and operated programs and contracted programs should have most if not all policies and documentation forms affected by new CalAIM requirements updated. Programs should be actively utilizing these forms and practices, including new assessment, care plan, problem list and progress note requirements ([BHIN 22-019](#)), No Wrong Door practices ([BHIN 22-011](#)), and Medical Necessity/Access to care requirements ([BHIN 21-073](#)).

The next major deadline for milestones on the BHQIP for the three overarching goals in March 1, 2022. There will be additional milestones in terms of Payment Reform (CPT coding) that will affect both County and Contractor E.H.R. systems for claiming, so there will be collaboration over the coming months to ensure all systems are being updated.

Related to data exchange, Solano County BHP is joining the SacValley MedShare Health Information Organization to meet the Data Exchange requirements associated with CalAIM. This includes, but is not limited to, using the HIO to exchange data between Solano's BHP and Solano's Managed Care Plan Partnership Healthcare.

Please send any questions regarding your programs' responsibilities for either the September 2022 or the March 2023 deadlines to your Solano QA Liaison or QualityAssurance@SolanoCounty.com. Solano County Quality Assurance program liaisons will continue to reach out to get a status update around implementation of these requirements.

22-11 (A.2) "DOWNTIME" CalAIM ASSESSMENT FORMS AVAILABLE (COUNTY & CONTRACTOR):

The following downtime forms are available for use in the field, if there are issues with Avatar being "down" or for contractors to use if not using an EHR.

These forms will be posted for county staff on [SharePoint Medical Record Chart Forms Library](#) and for contractors on the [Network of Care under Chart Forms](#):

- Youth Assessment CalAIM
- Youth Assessment CalAIM Addendum
- Adult Assessment CalAIM
- Adult Assessment CalAIM Addendum

CalAIM resources, including training materials and recordings can be found here:

- ◆ Resources for County Staff: [Behavioral Health - CalAIM Resources - All Documents \(sharepoint.com\)](#)
- ◆ Resources for Contractor Staff: [Mental Health Contract Agencies Solano County \(networkofcare.org\)](#)

22-11 (B) SOLANO COUNTY AUDIT PROCESS FOR FY 22-23 (COUNTY & CONTRACTOR):

This year's Utilization Review will be focused on CalAIM implementation within programs. The current plan is for all programs to be audited using a new CalAIM specific audit tool that will look at how programs are implementing updated forms and CalAIM documentation requirements. Treatment Plans and Authorizations will also be reviewed as appropriate to the program/client.

It is anticipated that audits will begin in January 2023. The audit process is currently being updated and more details will be provided in the near future.

22-11 (C) DHCS BHIN 22-045 ENFORCEMENT ACTIONS (COUNTY & CONTRACTOR):

[Information Notice 22-045](#) was published by the State in late August of this year in which DHCS provided additional clarification about their ability to impose administrative and monetary sanctions and contract terminations for county MHPs and DMC-ODS plans that "violate applicable state and federal laws and regulations".

BHPs "are responsible for ensuring that they and their subcontractors comply with all Contractual Obligations and applicable state and federal laws and regulations. These requirements must be communicated by each BHP to all subcontractors. DHCS may impose corrective action plans, administrative sanctions and monetary sanctions for non-compliance..."

The IN indicates that the State may take any of the following actions as part of a Correction Actin Plan (CAP) in response to non-compliance: 1) Temporary Withholding of funds; 2) Monetary Sanctions (\$25,000 for 1st violation, \$50,000 for 2nd violation, etc.); 3) Temporary suspension or termination of BHP personnel or contractors; 4) Contract Termination.

Solano County will be reviewing and updating contract language with Solano's subcontractors to reflect the fact that fines, sanctions and penalties, or the suspension or termination of the BHP's contract will directly fiscally impact subcontractors. It is therefore vital that every program work with their own compliance/quality teams and that each program collaborates with County Quality Assurance on meeting regulatory requirements for service delivery, problem resolution, data reporting, etc. so we can avoid becoming the targets of such penalties.

22-11 (D) UPDATED COMBINED CONSENT FORMS (COUNTY& CONTRACTORS):

Solano County has created a new Combined Consent Information Packet to provide to clients and a Consent Agreement Signature Page to obtain their written consents on whatever items they choose. This new process combines the previously used Consent for Treatment, Consent for Telehealth, and Consent for Email/Text forms. This new Consent Information Packet meets all CalAIM requirements as per BHIN 22-019 for telehealth consent.

All county programs need to use this form going forward – please recycle all blank copies of the previous versions of the 3 forms. If contractor programs decide to utilize this form, it needs be updated to include your program letterhead, program name in all sections, as well as be reviewed and approved by your agency legal counsel.

The new forms are available in English, Spanish, and Tagalog and can be found on the [Access to Services page on the Solano County website](#) for anyone, and [the Forms page on SharePoint](#) for County staff.

22-11 (E) UPDATES TO VACCINATION, TESTING & MASK REQUIREMENTS FOR BEHAVIORAL HEALTH FACILITIES (COUNTY & CONTRACTORS):

DHCS issued [Behavioral Information Notice 22-051](#) on September 21, 2022, which provides updates to previous guidance regarding vaccination and booster requirements, testing, and mask requirements for BH facilities. Please review BHIN 22-051 to see if your program is affected by any of the updates.

AVATAR UPDATES

22-11 (F) NEW CalAIM ADULT ASSESSMENT (COUNTY & CONTRACTORS USING AVATAR ONLY):

The Adult Assessment CalAIM22 will be available in Avatar. A demonstration on the new form was offered on October 20, 2022 and was recorded. The new form in Avatar has been designed to be as lean and time efficient as possible, addressing the seven CalAIM assessment domains and utilizing multiple time saving techniques to minimize time/effort needed for documentation.

The recording of the demo can be viewed here: [Adult Assessment CalAIM22 Demo 10-20-22 on Vimeo](#)

22-11 (G) AVATAR NOTIFICATION WHEN ENTERING DIAGNOSIS (COUNTY & CONTRACTORS):

When entering or pulling a diagnosis into the Diagnosis Form in Avatar you may receive a notification when a diagnosis is already included on the Problem list. The message states:

“The following codes already exists with an ‘active’ status”

[Lists SNOMED code and description]

“They will be skipped when adding codes to the Problem List”

This message is related to the Problem List that is being created in Avatar and is not an error that will cause any issues with your data entry. Please click “ok” and complete the diagnosis entry. Thank you!

We look forward to continuing to partner on implementing this and future State and Federally mandated initiatives that help to inform and protect the rights of those we serve.

Approved by Rob George, LCSW

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