



SOLANO COUNTY QUALITY ASSURANCE

QA INFORMATION NOTICE 23-05

MAY 1, 2023

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

23-05 (A) COVID-19 UPDATES (COUNTY & CONTRACTOR)

TELEHEALTH FEDERAL PANDEMIC WAIVER ENDING:

The US Department of Health and Human Services, Office for Civil Rights (OCR), put out notification on April 11, 2023, to indicate that the waiver of enforcement around telehealth that was put in place during the pandemic to allow for more flexibility in how telehealth was delivered is expiring at 11:59 PM on May 11, 2023.

This means that all healthcare entities utilizing a telehealth platform after the waiver expires need to utilize a platform that meets Federal requirements for privacy and security (e.g. HIPAA), including ensuring that the entity has a Business Associates Agreement.

Changing telehealth platforms is not always a fast process, but fortunately OCR has given us a grace period. The April 11, 2023, notification indicated that a grace period will be given from April 11 through August 11, 2023, to be fully compliant. For Contractors, Solano QA recommends, if you do not currently have a compliant telehealth platform, that you begin your process to acquire one now, so you are not at risk of OCR enforcement/legal liability.

23-05 (B) CalAIM – CALIFORNIA ADVANCING & INNOVATING MEDI-CAL (COUNTY & CONTRACTOR)

23-05 (B.1) DCHS CalAIM TECHNICAL ASSISTANCE AUDIT FEEDBACK

On April 27, 2023, Solano QA met with a DHCS auditor who completed a technical assistance audit focused on Solano County CalAIM documentation redesign. Results of the audit were positive and showed significant compliance to CalAIM documentation requirements outlined in [BHIN 22-019](#). The only exception was the Problem List, which is actively being worked on. In many cases, Solano was not only in compliance, but acknowledged for being ahead of other counties in implementation.

Thank you to all programs and staff who have participated in the CalAIM documentation redesign process! It was already very apparent, but confirmed even further, that Solano County has made significant efforts to make this important transition a success. All are appreciated!

23-05 (B.2) PAYMENT REFORM UPDATES

Solano County QA, Fiscal, and IT teams continue to meet regularly to determine the next steps of Payment Reform and implementation of changes within the County. There was a meeting held on April 13, 2023, with Solano County contractors to review Solano's proposed CPT codes and discuss changes this would cause. The recording of this meeting is [posted on Vimeo](#). Additional meetings will be scheduled in the coming weeks to provide up to date information on CPT codes and the impact on documentation for both County and Contractor staff.

23-05 (B.3) CLARIFICATION OF SERVICE LOCATION CODES FOR CLIENT AND PROVIDER

Two of the new progress note changes from CalAIM are to indicate the location of the client at time of service and the location of the provider when a service is provided via telehealth. When indicating location of provider for telehealth services on progress notes, please make sure to use "Field" when working from home, not "Home", as that would indicate the client's home.

23-05 (B.4) CLARIFICATION – UPDATED VERSION OF TELEHEALTH CONSENT REQUIRED FOR BOTH CURRENT AND NEW CLIENTS

This item is to provide clarification that the new version of the Telehealth Consent, which is CalAIM compliant, is required for **both** current clients, as well as all clients newly admitted to the BHP.

For County Programs, since there is a combined consent, you have the option to have the beneficiary or authorized representative indicate consent for telehealth only by initialing the telehealth item and signing the Consent Agreement Signature Page, or you may update all consents included on the Combined Consent Information Packet. Both forms can be found on the [Access to Services page](#) or on the [Forms page on SharePoint](#).

23-05 (C) UPDATED NOTICE OF ADVERSE BENEFITS DETERMINATION (NOABD) REFERENCE GUIDE AND NOABD POLICY (COUNTY & CONTRACTOR):

QA has updated both the NOABD Reference Guide and Policy AAA201 Notices of Adverse Benefits Determination Requirements, to reflect CalAIM documentation changes including that the Delivery System Notice will no longer be issued at time of access. For County staff, you may access the NOABD Reference Guide in the [NOABD Forms folder on the Forms page](#) and the NOABD Policy on the [Policy and Procedures page in SharePoint](#). For Contractors Staff, you may access both items on [Network of Care](#).

23-05 (D) ASSESSMENT FORM & DETAILS FOR TRANSITIONAL AGES YOUTH (TAY) (COUNTY & CONTRACTORS USING COUNTY ASSESSMENT FORMS SERVING TAY POPULATION):

A question was identified regarding which County assessment form to complete for the TAY population – the *Youth* or *Adult Assessment CalAIM22*. The following outlines considerations to be taken in this situation with a more detailed handout to be provided to adult clinics:

1. Completion of the *Youth* or *Adult Assessment CalAIM22* should be based upon the program that the individual will be going to – an adult or youth program.
2. If the individual is going to an adult program, the *Adult Assessment CalAIM22* would be completed. If the individual is under 21 years of age:
 - a. Both the CANS and the RNL would be completed.
 - i. Staff completing the CANS would need to be CANS certified.
 - b. If the individual is under 19, the PSC-35 would be completed.
 - c. If the individual is meeting medical necessity based upon the youth criteria of "The beneficiary has a condition placing them at high risk for a mental health disorder due to experience of trauma evidenced by any of the following: scoring in the high-risk range under a trauma screening tool approved by the department, involvement in the child welfare system, juvenile justice, involvement, or experiencing homelessness", staff would indicate this in the narrative box of that section.

23-05 (E) AUTHORIZATION FOR RELEASE OF INFORMATION (ROI) SIGNATURES (COUNTY & CONTRACTOR):

Due to the COVID-19 pandemic some of the requirements for client signatures were relaxed or temporarily suspended. During COVID, there was the option to get verbal permission on an ROI, but getting a signature has always been best practice. At this point programs should be getting signatures on ROIs or working toward a plan for how to do that ongoing. Please see [QA IN 21-05](#) for guidance.

We have confirmed with our Compliance Department that Solano County should resume pre-COVID practices, meaning that ROIs require a written signature. We recognize this may be challenging in some situations. In cases where written signature is not initially possible, verbal permission must be documented clearly and specifically on the ROI form **and** in a progress note. The ROI form should also indicate the date of the progress note. Staff should then make continued efforts to follow up to obtain signature.

23-05 (F) ANNUAL CONSUMER PERCEPTION SURVEYS (COUNTY & CONTRACTOR):

The Annual Consumer Perception Survey will be offered May 15th - 19th to every client who receives an outpatient service from a Solano Behavioral Health Plan program. This State mandated survey allows us to collect data for reporting National Outcome Measures (NOMs). These measures are required by the Substance Abuse and Mental Health Services Administration (SAMHSA). Participation in this annual survey is also a requirement for Community Mental Health Services Block Grant funding. This year, surveys can be completed on paper or online. Instructions for administering and collecting the survey were emailed to programs on April 13, 2023, from BHPIT@SolanoCounty.com. Please contact the Performance Improvement Team at BHPIT@solanocounty.com with any questions or for more information.

AVATAR UPDATES

No Avatar updates this month.

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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