



SOLANO COUNTY QUALITY ASSURANCE

QA INFORMATION NOTICE 24-11

NOVEMBER 1, 2024

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

24-11 (A) CalAIM – CALIFORNIA ADVANCING & INNOVATING MEDI-CAL (COUNTY & CONTRACTOR)

24-11 (A.1) QA Office Hours: QA Office Hours in November will be Wednesday, November 13, from 9:00-9:30 AM. Please join us and submit questions ahead of time using this [Survey Monkey link](#) that is also in the Outlook invitation or bring your questions to the meeting.

24-11 (B) NEW AUTHORITY FOR RELEASE OF RECORDS AND CONSENT FOR TREATMENT FOR MEMBERS POLICY UPDATES (COUNTY & CONTRACTOR)

Full implementation of this policy and associated documents is officially occurring this month. Please refer to the email that will be sent from QualityAssurance@SolanoCounty.com the first week of November for full details.

Pending Update to Policy and Process: It was identified that there is a clarification in the new policy needed regarding minors 12 and older signing releases of information. There is a statement in the law regarding it being accurate for minors 12 and older to have authority over their records if the youth could consent for services. This has brought up questions if there would be times a minor 12 and older would NOT have the authority to sign ROIs.

The language in the law appears to indicate that if the youth was determined by the clinical provider to not be mature enough to consent for services, then that would transfer to not signing ROIs. As described in the *Minor Consent Clinical Guidance* document, "professionals should start with a presumption of maturity" with minors 12 and older. This means that authority over medical records would apply for the majority of 12 and older clients as there would need to be clear clinical rationale and documentation to indicate that youth is NOT mature enough to consent for services and, in turn, would not have authority over release of their records.

QA will be working with County Counsel to update the policy as well as guidance to the system for these cases. This being said, the current policy needs to move forward as appropriate, which will likely be the majority of cases.

If you have any cases that you are concerned about, that seem more complicated, or that you have specific questions about, please reach out to your supervisor/manager and QA for consult. Staff are not being asked to implement the policy with these more nuanced situations immediately, but for these cases, staff **is** required to begin consulting with management and QA to determine next steps right away.

24-11 (C) DHCS BEHAVIORAL HEALTH PLAN (BHP) AUDIT (COUNTY & CONTRACTOR)

DHCS will be conducting their audit of Solano County BHP during the dates of December 16 and December 27, 2024. The audit will include a review of Specialty Mental Health Services (SMHS) and the annual audit of the Substance Use Prevention, Treatment, and Recovery Services Block Grant (SUBG). The purpose of the audit is to evaluate the BHP's program and operations and verify that medically necessary services are provided to Medi-Cal beneficiaries, both in compliance with State and Federal laws and regulations and/or the terms of the contract between DHCS and the BHP.

The QA team has submitted two rounds of data as requested by the State. Please respond timely if you receive a request for information from QA in the next weeks for additional information. We appreciate everyone's collaboration with this process.

24-11 (D) REQUIRED DISCLOSURE OF UNLICENSED STATUS FOR STUDENT CLINICAL TRAINEES & UNLICENSED CLINICAL STAFF (COUNTY & CONTRACTOR)

Per regulations, all student clinical trainees and registered AMFT clinical staff are required to disclose their unlicensed status to clients ([Business and Professions Code \(BPC\) §4980.44 \(MFT\); Business and Professions Code \(BPC\) § 4980.48](#)). Solano County is requiring ASWs and APCC's to participate in this process for program consistency although it is not in regulation at this time. Waivered Psychology Interns (student/predoc) or Waivered Psychological Associates (postdoc) are also required to disclose unlicensed status. We are working to formalize this process for consistency across the BHP.

There are four basic steps to the process:

1. Complete the *Consent for Behavioral Health Services* form with the client or ensure that it has been completed.
2. Verbally disclose to the client registered/waivered/unlicensed status at the time of first contact with the client.
3. Provide client with the written information regarding registered/waivered/unlicensed status.
4. Document in a progress note that the information was provided to the client.

To ensure that all staff are completing the necessary steps and providing the required information to clients, we are providing Instructions and resources which are posted on the [Forms page of SharePoint](#) for County staff.

- *Disclosure of Unlicensed Status to Clients Process* – This provides detailed instructions for each of the different provider types on each of the 4 steps above.
- *Disclosure of Unlicensed Status of Staff* – This is intended to be used as a script and can also be used as a handout to clients (i.e. if you do not have a business card with the required information). This document has the information in English, Spanish, and Tagalog.

Contractor programs need to determine their own process to ensure regulations are met, if there isn't one in place already. If Contractor programs would like the County forms to adapt to your program, please contact your QA liaison.

This process is effective immediately. Please discuss with your supervisor and QA if you have any questions.

AVATAR UPDATES

24-11 (E) USING CORRECT AVATAR CANS FORMS (COUNTY & CONTRACTOR)

Please note that there is a form in Avatar titled "CANS Update" – DO NOT USE this form as it is no longer current. Please make sure to use the CANS forms as described below.

For County staff and Contractor programs using Avatar as their EHR, the initial CANS is embedded in the *Youth Assessment CalAIM22*. For Contractors not using Avatar as their HER and for all subsequent CANS completed by all programs, the best practice is to use the *CANS Bundle* in Avatar. If you are not using the bundle, please make sure that you are using the two required forms included within the bundle, the *Child Adolescent Need and Strength CANS* form and the *CANS Supplemental* form. If not using the bundle, you will need to open each of these forms separately and complete them in order - the *Child Adolescent Need and Strength CANS* and then the *CANS Supplemental*.

The type of CANS being completing will be indicated in each form as follows:

- Initial: First CANS upon opening to the BHP
- Reassessment: All 6-month and annual CANS updates
- Discharge: Final CANS entered when the client is discharged from the BHP

- Administrative Close: Only selected at discharge from the BHP when there is no contact with the client and/or no information available to complete the discharge CANS appropriately
- Urgent: Used when the CANS is completed off the 6-month cycle for an urgent reason

If you have any questions regarding the CANS forms in Avatar, please contact your Quality Assurance liaison.

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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