



SOLANO COUNTY QUALITY ASSURANCE

QA INFORMATION NOTICE 23-02

FEBRUARY 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

23-02 (A) CalAIM – CALIFORNIA ADVANCING & INNOVATING MEDI-CAL (COUNTY & CONTRACTOR)

23-02 (A.1) UNIVERSAL SCREENING TOOLS TRAINING AND RESOURCES

The training for using the Screening Tool took place on January 17 for County staff and January 26 for Contractor staff. Below are the training tools and resources available for review and/or for those who were not able to attend the training.

- The PowerPoint from this training is posted here:
 - ◆ For County Staff: on [SharePoint in the "CalAIM Resources" folder](#)
 - ❖ For Contractor Staff: on the [Network of Care under "Solano CalAIM Resources"](#)
- The recording of the training is posted:
 - On [Vimeo](#) for all staff to access (including Contractor Staff – there were technical difficulties recording the Contractor specific training)
 - ◆ On [SharePoint in the "CalAIM Resources" folder](#) for County staff

QA is required to track attendance to show the State that we are training staff who will use the tool.

- Please ensure that all staff who would complete this tool but were not able to attend the training watch the video and complete the Training Tracking Attestation form posted in the section with the PowerPoint
- Please submit attestation forms to QualityAssurance@SolanoCounty.com

23-02 (A.2) REQUIREMENT TO INCLUDE ICC ON CARE PLANS

[BHIN 22-063](#) provided the Specialty Mental Health Services (SMHS) Protocol for fiscal year 2022-2023. It was clarified in [Survey Item 8.4 of the Protocol](#) that Intensive Care Coordination (ICC) needs to be included on a client's Care Plan, in addition to previously outlined services, when this service is to be provided.

This update specifically impacts FSP and STRTP programs who had previously received guidance in [Solano BHP's QA IN 22-09](#). This clarification from DHCS indicates that **BOTH** TCM and ICC should be included on the Care Plan AND Treatment Plan for a client. As this is a Survey item, this requirement could change in the future but is our current guidance. Thank you for your continued flexibility in meeting CalAIM requirements!

23-02 (B) PEER SUPPORT SERVICES (PSS) UPDATES (COUNTY & CONTRACTOR):

22-02 (B.1) PSS Grandparenting and Implementation of Program Curriculum – Extended Deadline

The deadline for PSS Certification Programs to implement the three additional areas of specialization – Crisis Services, Forensic, and Homelessness - has been extended from January 1, 2023, to July 1, 2023. In addition, the deadline to implement the grandparenting process to certify current staff employed as PSS, has been extended to June 30, 2023. More information can be found in [BHIN 22-066](#).

22-02 (B.2) PSS Program Certification Updates and Requirements

The Medi-Cal PSS Certification Program must have curriculum and core competencies (also referred to as areas of specialization) including Parent, Caregiver, Family Member, and Peers at program launch. Three additional areas of specialization that include Forensic, Homelessness, and Crisis Services, must be added by PSS Certification Programs by July 1, 2023, subject to DHCS approval as per [BHIN 22-061](#).

22-02 (B.3) PSS Certification Programs Oversight

DHCS has provided information on process for investigation of complaints regarding PSS Certification Programs and corrective actions, details on this process and how to file complaint can be found in [BHIN 22-062](#). DHCS will conduct periodic review to ensure programs are adhering to all federal and state requirements.

DHCS also requires programs to submit an annual PSS Program report to DHCS due annually on December 31st. More information on required elements of the report can be found in [BHIN 22-067](#).

Solano BH offers technical assistance and coaching peers, supervisors and providers hoping to expand the peer support workforce and support Peer Specialists in seeking state certification. Peer Specialists can bill for Medi-Cal Services. Our MHSA Wellness & Recovery team can assist in connecting peers with training, volunteer opportunities and begin a career in Peer Support. Please contact Desiree McCoy - Recovery Resilience Liaison: dmccoy@solanocounty.com or Lori Espinoza - Family Peer Liaison: lespinosa@solanocounty.com to find out more.

The County Behavioral Health Directors' Association (CBHDA) identified the California Mental Health Services Authority (CalMHSA) to operate a State approved Medi-Cal Peer Support Specialist Certification Program, to support consistency statewide. As the certifying body, CalMHSA is responsible not only for certification but also for examination and enforcement of professional standards for Certified Peers. For details on training, certification, examination, applying and more, visit capeercertification.org. For more information on CalMHSA's role, visit the CalMHSA website.

23-02 (C) DHCS FY 22-23 PROTOCOL REASONS FOR RECOUPMENT (COUNTY & CONTRACTOR):

DHCS has finalized [BHIN 22-063](#) including the [SMHS Reasons for Recoupment FY22-23](#). Though the reasons for recoupment have not significantly changed with CalAIM, the reasons do align with the CalAIM focus on fraud, waste and abuse. Medical Necessity still needs to be substantiated for each beneficiary along with Access Criteria to SMHS services. For clinical documentation some of the reasons for recoupment include:

- Service claimed without submitting documentation for the service, including when documentation provided does not describe an allowable service, and/or the service code billed does not match service documentation.
- Service not provided within scope of practice of person delivering the service
- Service solely for academic educational and vocational services, recreation, socialization not related to BH behaviors, transportation and clerical activities
- Technical items include: if a progress note is not signed (or electronic equivalent), if the date of claimed service does not match date of service documentation/progress note, and if more time claimed than documented on the progress note
- More than one provider claiming but documentation is missing documentation of specific involvement of each provider, amount of time of each provider and number of beneficiaries in the service activity
- Time not properly apportioned for all clients in group service activity
- Services claimed when client is in ineligible/lockout location
- Day Treatment Rehabilitation services billed but not meeting the time requirements for half day or full day programs, or not having the daily progress note

These reasons are important to be aware of so that you can be documenting services that accurately reflect the important services you are providing to clients.

23-02 (D) AB2275 – 5150 AND EMERGENCY DEPARTMENTS (COUNTY & CONTRACTOR):

AB2275 is legislation that went into effect January 1, 2023. The bill addresses the issue that individuals who are placed on a WIC 5150 involuntary hold in an Emergency Department (ED), Crisis Stabilization Unit (CSU), or Jail setting, but are not able to be transferred to an Inpatient Psychiatric Hospital/PHF in a timely manner, may historically have been denied their ability to contest the involuntary hold. AB2275 requires County Behavioral Health Plans to create policy and procedures to establish 5150 Certification Hearings for any individual placed on a WIC 5150 hold in an ED, CSU or Jail setting who has not been transferred to an inpatient facility within 7 days.

Solano County Behavioral Health has worked with Solano County Counsel, Patients' Rights Advocates, and Solano local EDs, CSU and Jail services to develop policy and a process to schedule hearings after 72 hours for any individual on a WIC 5150 hold who is at risk not to be transferred by day 7. Solano Patients' Rights Advocates are the point of contact and EDs, CSU and Jail services can reach them at PatientsRights@SolanoCounty.com.

Furthermore, in light of these changes, Solano BH will also update policies around LPS 5150 training, protocols and processes. We will share more as these get developed in the bimonthly LPS/Psychiatric Emergency Services (PES) Meeting. If you are interested in joining that group, please email vepringle@solanocounty.com.

UPDATES TO PREVIOUS QA IN

Replacement to QA IN item 22-09 (A) For Programs That Need Both a Care Plan and a Treatment Plan (FSPs and STRTPs): ICC must be included on the Care Plan in addition to TCM and Peer Support Services. At this time, IHBS and TBS can be on the treatment plan only. This does not change the requirement for programs that do not require a Treatment Plan (i.e. non-FSP and non-STRTP) to include IHBS, TBS, and ICC on a Care Plan. See item 23-02 (A.2) above.

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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