



SOLANO COUNTY QUALITY IMPROVEMENT

QI INFORMATION NOTICE 22-05

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

GENERAL UPDATES

22-05 (A) CalAIM – CALIFORNIA ADVANCING & INNOVATING MEDI-CAL (COUNTY & CONTRACTOR) UPDATED DOCUMENTATION REQUIREMENTS

On April 22, 2022, DHCS posted [BHIN 22-019](#), which provides the updated documentation guidelines for assessments, plans, progress notes and consent for telehealth. Solano County QI will host a meeting for contract agencies to review this information on May 3, 2022 and keep county programs updated through trainings and QI information notices.

NO WRONG DOOR POLICY:

This new policy ensures people receive timely services without delay and alters how beneficiaries are allowed to seek care across plans without interruption (see [DHCS BHIN 22-011](#)). There are 3 primary aspects:

1. Specialty Mental Health Services (SMHS) Provided During the Assessment period: Clinically appropriate SMHS are covered and reimbursable during the assessment process prior to determination of a diagnosis or a determination that the beneficiary meets access criteria for SMHS. Services rendered during the assessment period remain reimbursable even if the assessment ultimately indicates the beneficiary does not meet the criteria for SMHS.
2. Co-occurring Substance Use Disorder: MHPs must not deny or disallow reimbursement for SMHS provided to a beneficiary who meets SMHS criteria on the basis of the beneficiary having a co-occurring SUD, when all other Medi-Cal and service requirements are met.
3. Concurrent SMHS and Non- SMHS (NSMHS): MHPs must not deny or disallow reimbursement for SMHS provided to a beneficiary on the basis of the beneficiary also meeting NSMHS criteria and/or also receiving NSMHS services, provided that the concurrent services are clinically appropriate, coordinated and not duplicative.

DHCS is developing a set of statewide tools (effective in 2023 pursuant to future guidance) to facilitate screenings and transitions of care for the specialty mental health, Medi-Cal managed care, and fee for service systems.

DIAGNOSIS (Dx) CODES PRIOR TO COMPLETED ASSESSMENT:

DHCS [BHIN 22-013](#) identifies new options for Dx's allowed during the assessment period for outpatient behavioral health services prior to a Dx being established.

Licensed, registered, and waived providers can use:

- Z03.89 - "Encounter for observation for other suspected diseases and conditions ruled out"
- "Other specified" and "Unspecified" disorders," or "Factors influencing health status and contact with health services"

All clinical providers (not required to be, or be supervised by, a licensed, registered, or waived staff), as appropriate, can use:

- Z55-Z65 - "Persons with potential health hazards related to socioeconomic and psychosocial circumstances"

DO NOT USE THE FOLLOWING Z CODES AS THEY ARE EXPIRED: Z55.8, Z59.0, Z59.4, Z59.8, Z62.810

22-05 (B) NOABD UPDATES & REFERENCE GUIDE (COUNTY & CONTRACTOR)

Notices of Adverse Benefit Determination (NOABDs) are requirements regulated by both the State and Federal government to ensure beneficiaries of behavioral health plans (BHPs) know what decisions are happening with their care and their rights to act on their own behalf (see [DHCS BHIN 18-010E](#)).

It is the responsibility of the BHP program providing the care to issue the NOABD to a beneficiary (client), scan a copy into the client record, and send a copy to County QI. DHCS recently put Solano BHP on a Corrective Action Plan after the December 2021 System Review to improve NOABD compliance, therefore beginning the process of improvement.

There are multiple different NOABD templates for different situations (e.g. if care is modified or denied at point of access, post initial assessment, or during the course of treatment). NOABDs are also issued for timeliness of services offered and services authorized. Solano QI has updated the NOABD Reference Guide to assist with determining when and what type of NOABD to send in a given situation. This reference guide is posted:

- ◆ For County Staff on [SharePoint MH Forms NOABD Folder](#)
- ❖ For Contractor Staff on the [Network of Care in the section on "Reference Materials"](#)

Solano BHP QI and Solano IT are working to develop a NOABD form and reports in Avatar to aid in efficiency of use and tracking/monitoring required by DHCS. Additionally, Solano QI hopes to provide a NOABD refresher training for all staff. These updates should be available in the coming months.


22-05 (C) NACT FOR FISCAL YEAR 22-23 (COUNTY & CONTRACTOR):

Network Adequacy is a set of requirements stemming from the Federal Final Rule (see [DHCS BHIN 18-011](#)), that require the regular monitoring of each health plan's network of providers in terms of time and distance (proximity of providers to beneficiaries), provider/beneficiary ratios (how many providers there are in the MHP per beneficiary), etc. Solano, along with all other counties, is required to report out annually on our network adequacy data, including submission of a specific document called the Network Adequacy Certification Tool (NACT).

Deadline: This year the annual NACT and other Network Adequacy documentation must be sent to DHCS on or before July 1, 2022. In order for QI to meet that deadline, QI will be working with all programs to submit their NACT data toward the middle or the end of the May. QI asks for your collaboration in sending provider information in a timely manner to meet required standards.

22-05 (D) UPDATED ACKNOWLEDGMENT OF RECEIPT AND BBS NOTICE TO CLIENTS (COUNTY & CONTRACTOR):

As of May 2022, please use the updated versions of the *Acknowledgement of Receipt* and the *BBS Notice to Clients* for all new clients opening to Solano BHP. This *BBS Notice to Clients* has been added to the *Acknowledgement of Receipt* in order to document that the information is provided to all clients upon intake to the BHP. It also now includes the link to the [Access to Services page on SolanoCounty.com](#) where all documents required to be provided are posted for public access. Along with the Solano County website:

- ◆ County staff can access both updated forms  [on SharePoint](#)
- ❖ Contractor staff can access the *BBS Notice to Clients* [on the Network of Care](#). The *Acknowledgement of Receipt* is not posted as Contractors must have their *Acknowledgement of Receipt* on their program's letterhead

22-05 (E) CONSUMER PERCEPTION SURVEYS MAY 16-20, 2022 (COUNTY & CONTRACTOR):

Solano MHP will be participating in the DHCS Consumer Perception Survey **Monday, May 16th, through Friday, May 20th**. This is an important process for our clients and their families to provide feedback to our programs. Online survey links, paper surveys and instructions will be sent from QI prior to the survey week.

AVATAR UPDATES

No Avatar Updates at this time

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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