CalQIC 2020

MONTEREY COUNTY BEHAVIORAL HEALTH

Avanzando Juntos Forward Together
Monterey County Profile

 Galactic Position: Planet Earth

 Time and Space: July 1st, 2018 (go live)

 Mass: Medium Sized County

 SUD Inhabitants: 4 Contracted Providers
  • 4 Residential Multi-tiered Programs
  • 2 Withdraw Management Programs
  • 2 Narcotic/Opioid Treatment Programs
  • 7 Outpatient Programs
Monterey County Profile

Number of Clients Served in SUD Program (FY 18/19): 1,439

Average Age Per Client: 38
• Support the development of an integrated system of care while expanding substance use service benefits and availability of services to a greater number of individuals and families who want and need help.

• Strengthen collaborative partnerships through new service contracts with a network of community-based providers that have extensive history of serving individuals and families in Monterey County.

• Expanded to include a continuum of care to provide accessible, individualized treatment to support recovery.

*With more services comes more responsibility to monitor!*
Mission Preparation

- Develop a plan
- Build the team
- Learn the rules
- Provide training and technical assistance
- Embrace change
Monitoring Protocol

- Pre-Review
- Review
- Post Review
Pre-Review

Notify providers of upcoming review via e-mail approximately 1 month in advance.

Include **Site Review Notification letter** along with request to complete **ADA Accessibility Checklist** form and submit two weeks prior to on site review. The following documents are also requested:

• Provider Organization Chart
• Program protocols/policies/procedures
• Personnel Policies/Procedure Manuals
• Grievance policy/procedures and a copy of the brochure/document
• Group Sign In Sheets
Example of SUD Notification Letter

COUNTY OF MONTEREY
HEALTH DEPARTMENT

Dear [Company Name],

This letter serves as notification that the Monterey County Behavioral Health Bureau will begin a Substance Use Disorder Services Program Compliance Review of your agency on [ENTER REVIEW DATE HERE].

We will be conducting a programmatic and administrative compliance review. The review will cover the period of [ENTER TIME PERIOD HERE]. The areas that will be monitored with regard to your contracts are listed below:

1. Review of personnel files
2. A review of your agency’s Contract Compliance with the FY 2019-20 Monterey County BH Division SUD Agreement

Please provide our office with the following documents by [ENTER A DATE 2 WEEKS BEFORE DATE OF REVIEW].

1. A current copy of your agencies Organization Chart
2. A current and complete copy of your program protocols/policies/procedures
3. A current and complete copy of your personnel Policies/Procedure Manuals
4. A copy of your agency’s Opioid policies/procedures and a copy of the brochure/document
5. A completed Checklist for Accessibility: Alcohol and Drug Programs (attached)

Please be aware that the monitors will require quiet workspace. If you have any questions, please contact me at (831) 755-4545.

We look forward to our visit.

Sincerely,

[Your Name]

[Your Title]

[Address]

Attachment: Checklist for Accessibility: Alcohol and Drug Programs.
Review Quick Facts

Program reviews are conducted on an annual basis

10-15 consumer charts are randomly selected and reviewed per site, all services are reviewed during selected timeframe

Reviewers include Senior clinician staff from QI (2 per site), and County SUD Program Administrator

Total review takes clinicians approximately two weeks to complete

Onsite component includes exit interview
Review is two part

**Part 1: Clinical Review**
- Program Specific Documentation
- ASAM Based Assessments
- Medical Necessity
- Treatment Plans
- Individual and Group Notes
- Medical Exam
- Residential Authorizations
- Group sign in sheets

**Part 2: Administrative Review**
- Program Policies
- Charitable Choice
- Accessibility of Service Requirements
- CLAS Standards
- CalOMS
- DATAR
- Facility Walk-Through (onsite)
- Review of personnel charts (onsite)
On site: Review

On day of scheduled site review the following should be completed:

• Facility Walk-Through as outlined in the Administrative tool
• Review of personnel charts as outlined in the Administrative tool
• Exit Interview
Example Format of Monitoring Tool

- A. Line Item for reference
- B. Description of requirement
- C. Rating
  - M= Met
  - NM= Not Met
  - PM= Partially Met
  - N/A= Not applicable
- D. Citation
- E. Comments
Post Review

• Final results, including a **Site Findings Notification Letter** and **Plan of Correction** are sent to Programs to review

• Program has two weeks from receipt of **Site Findings Notification Letter** and **Plan of Correction** to address deficiencies

• Plan of Correction is monitored and reviewed by QI staff until all items are brought into compliance
Example of Site Findings Notification Letter

Agency Name
Program/Level of Care
Address
XXXXX, CA. XXXXX

Subject: Substance Use Disorder Contract and Program Compliance Review

Dear XXXXX,

It was a pleasure working with you and your staff during the Monterey County Substance Use Disorder Program Compliance review for fiscal year 2019 - 2020. Attached is the final report of the review which includes regulatory citations for the items reviewed along with a comment section for added clarity of our findings.

Please submit your Plans of Correction (POC) by XXXXX2021 to Monterey County Behavioral Health (MCBH) Quality Improvement at YYYY@county.ca.gov and to the MCBH Substance Use Disorder Administrator at YYYY@county.ca.gov with specific details regarding your response to the deficiencies cited. Please refer to each section in the report for issues that have been marked as 187 (Not met) or 188 (Partially met) and ensure it is addressed in the POC. In your POC, please describe the following:

- Description of how you will correct each deficiency
- Why will be responsible for quality assurance?
- How often the program will monitor participant records in order to ensure compliance?
- Proposed Implementation Date
- If applicable, submit proof of any corrections made

If you have any questions, please do not hesitate to contact our office. We look forward to our continued partnership.

Sincerely,

YOUR NAME HERE
YOUR TITLE HERE
Monterey County Quality Improvement Department
1611 Quaker Hill Way Suite #120
Salinas, CA 93906
(831) 765-4146

C/L Lindsey O’ Leary, Quality Improvement Manager
Andy Noeld, MCBH SUC Administrator
### Example Format of Plan of Correction

- 1. Line Item for reference
- 2. Description of deficiency
- 3. Correction taken by Program
- 4. Attachments
- 5. MHP response

<table>
<thead>
<tr>
<th>Description of Deficiency</th>
<th>Corrective Action</th>
<th>Attachments</th>
<th>MHP Response</th>
</tr>
</thead>
</table>
| CHART ID: 12345 DEFICIENCY LEVEL: NM Description: no emergency contact identified in chart or in scanned documents, no ROIS on file for emergency contact. | The intake counselor is now completing the emergency contact on admission day  
Program has conducted an in-house training on proper consent completion on 10/8/19, see attached sign in sheet and agenda description | RR 1 | accepted |
Ground Control, Coms, and the SUD Universe

• Monthly SUD Provider meetings
  • All four SUD providers are represented
  • County SUD Contract Monitor
  • County Access and SUD Deputy Director
  • County Authorization Team Representative
  • County Quality Improvement Representative

• SUD Documentation Guide

• QI newsletter

• Transparency with Policies and Procedures and Monitoring Tools

• Electronic Health Records Training

• Clinical Documentation Standards Training
Mission Outcomes

Successes
• Compliance due to EHR customization
• Timeliness of Authorizations
• Increase in utilization of outpatient services and utilization of Recovery Services

Challenges
• Quality of documentation
  • Transition to electronic health record
• Low billing of case management and MAT
• Understaffing for Providers and MHP
• Clarity of Rules and service limitations
Next Steps

• Expand training opportunities for clinical documentation and electronic health record navigation
• Develop Peer Support specialist
• Increase utilization of case management and MAT services
• Strategize ways to reduce documentation time
• Improve compliance "bells and whistles" in our Electronic Health Record
• Support continuum of care transitions
"Change is the essential process of all existence."

-Mr. Spock

*Let That Be Your Last Battlefield, Star Trek: The Original Series*
Make Contact

Monterey County Behavioral Health Quality Improvement
www.mtyhd.org/qi
(831) 755-4545

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