Please click the Survey Monkey link in the chat to take a quick three question survey
Shifting our Focus: Compliance vs. Quality

California Mental Health Services Authority (CalMHSA)

May 4, 2022
Introductions

Amie Miller, PsyD
Director - CalMHSA

Dawn Kaiser, LCSW, CPHQ
Director of Managed Care Operations
- CalMHSA

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Utilization Manager - CalMHSA
Training Objectives

Participants will walk away with:

• Orientation to CalAIM Compliance (Quality Assurance)
• Understanding of Quality of Care (Quality Improvement)
• Real Life Examples
### Transformation Webinars:
For County Leadership and QI Staff

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WHERE WE HAVE BEEN
WHERE WE ARE GOING
HOW TO GET THERE
WHERE WE HAVE BEEN:

RECEIVED
29 JUN 2011

BY:
WITH FINITE RESOURCES

AND THE NEED TO MITIGATE RISK

COMPLIANCE HAS TAKEN UP ALL THE SPACE

OFTEN WITHOUT BRINGING VALUE TO OUR SYSTEMS

OR THE PEOPLE WE SERVE
The Compliance/Quality Continuum

Compliance → Quality → Optimized Outcomes
Where We HAVE BEEN

Compliance

• A Note for Every Service
• Treatment Plan Start and End Dates
• Client Signature Requirements
• Only Select Services Prior to a Treatment Plan
• No Services Prior to a Diagnosis

Quality

Optimized Outcomes
Where We Are GOING

Compliance • Quality • Optimized Outcomes

- A Note for Every Service
- Treatment Plan Start and End Dates
- Client Signature Requirements
- No Therapy Prior to a Treatment Plan
- No Services Prior to a Diagnosis
Where We WILL BE GOING

Measuring Performance on Key Metrics:
• Follow Up Post Psychiatric Hospitalization
• Initiation and Engagement for Substance Use Treatment
• Follow Up Post ED Visit for Mental Illness (FUM)
• Follow Up Post ED Visit for Substance Use Disorder (FUA)
• Pharmacotherapy for Opioid Use Disorder (POD)
Why We All Got Into This Business

Compliance  Quality  Optimized Outcomes

- Increased Life Expectancy
- Reduced Suffering In Response to Early Detection and Treatment
- Recovery
- People
- Place
- Purpose
What Do We Need to Move Forward?

National Committee on Quality Assurance:

NCQA noted multiple challenges for Behavioral Health

- Standardized Metrics
- Meaningful Outcomes Measures
- Harmonized State Reporting Requirements
- Systematized Client to Provider Matching
- Flexible EHRs to meet Enterprise needs
We Are On a Journey:
Special Guest:
Dr. Palav Babaria
Chief Quality Officer
Deputy Director of Quality/Population Health Management, DHCS
DHCS Focus On Quality
Thinking big: DHCS’s New Comprehensive Quality Strategy

BOLD GOALS: 50x2025

- Close racial/ethnic disparities in well-child visits and immunizations by 50%
- Close maternity care disparity for Black and Native American persons by 50%
- Improve maternal and adolescent depression screening by 50%
- Improve follow up for mental health and substance use disorder by 50%
- Ensure all health plans exceed the 50th percentile for all children’s preventive care measures
New Mental Health Plan accountability measures to support CQS goals

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<th>Measure Steward</th>
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<td>NCQA</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; year baseline reporting followed by &gt;50&lt;sup&gt;th&lt;/sup&gt; percentile (or 5% increase over baseline if &lt;50&lt;sup&gt;th&lt;/sup&gt; percentile)</td>
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<td>Antidepressant Medication Management</td>
<td>NCQA</td>
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<td>Use of First-Line Psychosocial Care for Children and Adolescents on Antipsychotics</td>
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<td>5</td>
<td>Adherence to Antipsychotic Medications for Individuals with Schizophrenia</td>
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New DMC-ODS Plan accountability measures to support CQS goals

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<td>Initiation and Engagement of Alcohol and Other Drug Abuse or Dependence Treatment</td>
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What is Needed to Get Us Where We Need to Go?

• Capacity-building
• Technical Expertise
• Outside Consultation
• Statewide Efforts and Supports
Transitioning from the old way to the new way can be tricky...
Special Guest: 
Dr. Shaina Zurlin 
Chief Medi-Cal BH Division, DHCS
Compliance Game Show

CAP vs. No CAP
Intake and Authorization

Issue:
At one agency, clients were consistently enrolled without complete and signed informed consent documentation.

Compliance/Quality Concern
Corrective Action Plan (CAP)

General Concern
Feedback only – No CAP

Not a Concern
Intake and Authorization

Issue:
At one agency, clients were consistently enrolled without complete and signed informed consent documentation.

Compliance/Quality Concern
Corrective Action Plan (CAP)

General Concern
Feedback only – No CAP

Not a Concern
Compliance Game Show - Assessment

Issue:
During a chart review, it is identified that a clinician completed an assessment for a client 90 days after intake.

Compliance/Quality Concern
Corrective Action Plan (CAP)

General Concern
Feedback only – No CAP

Not a Concern
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Corrective Action Plan (CAP)

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Feedback only – No CAP

Not a Concern
Assessment

Issue:

One of the 7 assessment domains is not completed; however, the remainder of the assessment as well as other documentation in the client chart clearly indicates the presenting concerns that are guiding treatment.

Compliance/Quality Concern
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Feedback only – No CAP

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One of the 7 assessment domains is not completed; however, the remainder of the assessment as well as other documentation in the client chart clearly indicates the presenting concerns that are guiding treatment.

Compliance/Quality Concern
Corrective Action Plan (CAP)

General Concern
Feedback only – No CAP

Not a Concern
Assessment

Issue:
An assessment was completed, but not marked as “finalized” within the Electronic Health Record. Because it was never finalized, the clinician's signature is missing from the document. All required elements of the assessment are present and thorough. (This is referring to an assessment document and NOT an assessment progress note)

Compliance/Quality Concern
Corrective Action Plan (CAP)

General Concern
Feedback only – No CAP

Not a Concern
Assessment

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An assessment was completed, but not marked as “finalized” within the Electronic Health Record. Because it was never finalized, the clinician's signature is missing from the document. All required elements of the assessment are present and thorough. (This is referring to an assessment document and NOT an assessment progress note)

Compliance/Quality Concern
Corrective Action Plan (CAP)

General Concern
Feedback only – No CAP

Not a Concern
Problem List

Issue:

The progress notes indicate that staff are working with a client on family functioning concerns. However, the problem list does not include any reference to family or relational problems.
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Problem List

Issue:
A county has never implemented the problem list

Compliance/Quality Concern
Corrective Action Plan (CAP)

General Concern
Feedback only – No CAP

Not a Concern
Problem List

Issue:
A county has never implemented the problem list

Compliance/Quality Concern
Corrective Action Plan (CAP)

General Concern
Feedback only – No CAP

Not a Concern
Issue:

A program is providing case management services without a treatment plan having been completed. The areas in which case management is being provided is present on the problem list.
Issue:
A program is providing case management services without a treatment plan having been completed. The areas in which case management is being provided is present on the problem list.
Progress Notes

Issue:
During the assessment process, a client received individual rehabilitation, case management and family therapy to address needs. These services were provided and billed for prior to completion of the assessment and establishment of a diagnosis.

Compliance/Quality Concern
Corrective Action Plan (CAP)

General Concern
Feedback only – No CAP

Not a Concern
Progress Notes

Issue:
During the assessment process, a client received individual rehabilitation, case management and family therapy to address needs. These services were provided and billed for prior to completion of the assessment and establishment of a diagnosis.

Compliance/Quality Concern
Corrective Action Plan (CAP)

General Concern
Feedback only – No CAP

Not a Concern
Issue:

Noted interventions in a variety of progress notes describe case management interventions. However, these notes consistently utilize a collateral service procedure code.

Compliance/Quality Concern
Corrective Action Plan (CAP)

General Concern
Feedback only – No CAP

Not a Concern
Issue:
Noted interventions in a variety of progress notes describe case management interventions. However, these notes consistently utilize a collateral service procedure code.
Issue:
Clients enrolled in a mental health program are also receiving brief intervention related to their co-occurring substance abuse needs and linkage to more comprehensive substance abuse treatment services through the county’s DMC-ODS provider network.
Progress Notes/Co-Occurring Treatment

Issue:
Clients enrolled in a mental health program are also receiving brief intervention related to their co-occurring substance abuse needs and linkage to more comprehensive substance abuse treatment services through the county’s DMC-ODS provider network.

Compliance/Quality Concern
Corrective Action Plan (CAP)

General Concern
Feedback only – No CAP

Not a Concern
Feedback? Questions?

Calaim@calmhsa.org
Thank You!
Please click the NEW Survey Monkey link in the chat to complete our post-training evaluation
THANK YOU!