Encounters created outside the Client Program Enrollment date range
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A recent Audit revealed encounter errors – Encounters were created and released with a service date outside the client program enrollment date range. 12,049 records identified since 2018 with 2,142 records occurring during 2022, 190 records since Jan 2023.
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Example of error:

Client Program Enrollment

Program Enrollment List			
Actions	**Program Name**	**Start Date**	**End Date**
✏	ODS OS	4/11/2022	4/18/2022

Encounter Service Date outside the enrollment date range

Encounter List (Export)					
Actions	**Svc Date**	**Service**	**ENC ID**	**Rendering Staff**	**Program Name**
✏	5/23/2022	Group Counseling OS			ODS OS
✏	5/20/2022	Group Counseling OS			ODS OS
✏	5/18/2022	Individual Counseling OS			ODS OS
✏	5/18/2022	Group Counseling OS			ODS OS
✏	5/17/2022	Group Counseling OS			ODS OS
✏	5/16/2022	Individual Counseling OS			ODS OS

Discharge record was entered in SanWITS two months later 6/20/22 and backdated to 4/18/22. Services were created in May (see above) when the client had previously been discharged on 4/18/22

Discharge Profile

Discharge Date 4/18/2022   Admission Date 4/11/2022

Discharge Status 6-Left Before Completion with Unsatisfactory Progress/ Administrati

Ancillary Services Referral

Ancillary Services
0-None/No Other
1-Managed Care Plan MH F
2-Managed Care Plan PCP

Selected Ancillary Services

Record Status

Record Created By   Created Date 6/20/2022 10:23 AM

Last Updated By   Last Updated Date 6/20/2022 10:24 AM

How to Prevent Fraudulent Billing:

- Verify the client is actively receiving SUD treatment services at facility for service date (not discharged)
- Verify the client is in the appropriate program enrollment on the SanWITS encounter screen
- Enter the discharge record and close the client program enrollment according to data entry standards (see SanWITS Data Entry Standards posted to Optum website under the SanWITS tab)
- Before Discharging the client verify billing has been completed
- Before making corrections to the CalOMS Admission and/or Discharge, or program enrollment start/end dates, review encounters service dates

New Process:

SUD MIS team will begin generating a weekly Program Integrity (PI) report to monitor encounters entered outside the client program enrollment date. Encounters identified will be sent to SUD Treatment Providers for appropriate corrections.

Instructions to providers for corrections:

• Review the encounter and confirm the service date

• Confirm the Program enrollment and/or the LOC Start and End date

• If the encounter service date was entered incorrectly (service was provided):

- o If encounter is not released to bill, correct the encounter service date
- o If encounter is in Claim item list, reject the claim back and make correction to the encounter then release to bill again
- o If encounter has been batched and billed, contact the Billing unit and QI Matters for appropriate action

- If the encounter was entered, but the service was not provided:
  - o If encounter is not released to bill, delete encounter
  - o If encounter is in claim item list, reject the claim back and delete the encounter
  - o If encounter has been batched and billed, contact the Billing unit and QI Matter for disallowance

• If the program enrollment/LOC start/end date is incorrect:

- o Outpatient/OTP providers should correct the program enrollment dates, admission and/or discharge dates
  - ▪ Contact SUD MIS support with correction to avoid CalOMS errors
- o Residential providers should contact SUD MIS support desk SUDEHRSupport.HHSA@sdcounty.ca.gov to reopen and correct the program enrollment/LOC dates.