To:	**Mental Health Contracted Service Providers**
From:	**Behavioral Health Services – Quality Management Unit**
Date:	**May 20, 2022**
Title	**BHS Plan: CalAIM Documentation Reform Compliance**

The Department of Health Care Services (DHCS) released the final information notice regarding documentation reform, BHIN 22-019 (ca.gov) effective July 1, 2022 which outlines new requirements aiming to improve the beneficiary experience by streamlining and standardizing clinical documentation requirements across Medi-Cal SMHS, DMC, and DMC-ODS services.

DHCS recognizes the complexity and tremendous effort it will take on the part of the counties to implement these updates and ensures that the changes will be made in a thoughtful manner with attention to provider and beneficiary impact. The County of San Diego (County) is expected to have Policies and Procedures in place for implementation by July 1, 2022, and DHCS has identified September 30, 2022, as a delivery date for many of the related deliverables. With these dates in mind, the County will work strategically to roll out the new requirements.

Assessment:
With the Cerner Millennium Outpatient module build continuing, and recognition that development of new forms in the current system is not practical, the assessment update will roll out in phases.

During this first phase, the behavioral health assessments (BHA) in the current Cerner product (CCBH) will remain as developed, however, the required fields which correspond with the required domains set by DHCS, will be bolded for reference. The other fields will be optional, and County QM will review the bolded sections to monitor compliance.

The second phase of this roll out will be to include the System of Care provider representatives to develop an assessment which meets all domain criteria that can be built in the new Cerner Millennium product, using additional formatting functions available to streamline documentation.

The third phase will build the new form in Cerner Millennium for electronic roll out to the System of Care.

Problem List/Client Plan:
The development of the required Problem List is currently being tested for integration into the current Cerner product (CCBH) to determine next steps and timelines. This will be completed with the same intent as the assessments while focusing to ease of burden on the beneficiaries and providers. For services which require a Client Plan, the current Plan form is being reviewed and modified to adhere with regulations and meet CalAIM expectations.

Progress Notes:
We recognize the requirement for progress notes to be completed within 3 business days, or 24 hours of a crisis service, is of concern to the System of Care. Progress note templates are currently being reviewed and ensure there is understanding that the updated documentation standards must be in place before this timeline is likely to be met.

As updates are made, a notification will be released to the System of Care and CalAIM topics will be addressed in various meetings. If you have input or need information on the available venues for discussion, please reach out to QI Matters.

For More Information:
- HHSA, QI Matters: qimatters.hhsa@sdcounty.ca.gov