

## NorthCare Network Directive

*NorthCare Network Directives are developed through a collaborative interpretation of rules, regulations, and/or policy. They are provided as a standard for those working within our Network to assist in achieving compliance and consistency in our work.*

<b>Title:</b> Documentation and SAL Requirements for Services Provided by Sub-Contractors or CMHSP Staff	<b>Functional Area(s):</b> ELMER (Electronic Medical Record)	<b>Section(s):</b> Medical Record Documentation SAL Completion
<b>Directive Supersedes:</b> N/A	<b>Lead Author(s):</b> Diane Bennett Joan Tappy	<b>Per NorthCare Directives Policy Authorized by:</b> Claudia Johnson, Interim COO
<b>Sent for 14-Day Review On:</b> March 12, 2010	<b>Effective Date:</b> 4/9/10	<b>Review/Revised Date:</b> N/A
<b>Applies To:</b> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input checked="" type="checkbox"/> CMHSP  <input checked="" type="checkbox"/> CMHSP Sub-Contractors  <input type="checkbox"/> NorthCare CA                 </div> <div style="width: 45%;"> <input type="checkbox"/> CA Sub-Contractors  <input type="checkbox"/> Other: _____  <input type="checkbox"/> Excluding: _____                 </div> </div>		

**PURPOSE:**

In response to CMHSP request for clarification of documentation and SAL requirements for services provided by sub-contractors and CMHSP staff to ensure all providers comply with regional, state and federal documentation standards.

**DEFINITIONS:**

For the purposes of this directive:

- Service Provider – an individual or organization authorized to deliver Medicaid services to an eligible beneficiary. Service providers may contract with the CMHSP or be directly employed by a CMHSP. For example: individuals employed by CMHSP, AFC providers, etc.
- Primary Provider - the individual responsible for implementing the IPOS (a.k.a. primary clinician, care manager, etc.)

**SERVICE ACTIVITY LOG (SAL) DEFINITIONS:**

ELMER provides for four types of SALs. All documentation must be created or scanned into ELMER prior to completing the corresponding SAL noted below.

1. Created Document SAL – This SAL is attached, or *“linked” directly* to a document created in ELMER and *is used to record details about the services* provided by CMHSP staff and CMHSP Physicians. Documents must be created before the SAL.
2. Scanned Document SAL – This *type of SAL* is attached to a document after *the document has been* scanned into ELMER and is used for services provided by CMHSP staff. Once the document is scanned into ELMER a SAL is created and is to be completed. Note: Not all documents scanned into ELMER created a SAL.
3. Stand Alone SAL – This SAL is to be used only for Q3014 Originating Site Fee for Telemedicine and for direct data entry of paraprofessional services (after the note is scanned).
4. Extended SAL (Used for CMHSP Direct Run Services Only) – This SAL allows for batch entry for services noted below that are provided by CMHSP staff. Supporting documentation must be in the clinical record.

- a. Personal Care T1020 – day service
- b. Community Living Supports H2016 – day service
- c. Clubhouse Psychosocial Rehabilitation H2030 – 15 minute service
- d. Drop-In Attendance H0023- encounter
- e. Respite T1005 – 15 minutes
- f. Respite H0045 – day service in out of home setting
- g. S5151 p/ day Respite
- h. H2014 (Iron River Gathering Place)
- i. H2015 (Phoenix Center)
- j. H0043 per diem

**DIRECTIVES:**

1. Claims Entry (Used for Sub-contract Providers not Documenting Directly into ELMER) NOTE: December 2009 – Upon request of regional Finance Directors the need to document service start and stop times in ELMER will be shut off to minimize data entry time for the following codes:
  - H2014 Skill Building
  - H2015 Community Living Supports (CLS)
  - H2023 Supported Employment
  - T1005 Respite
  - T2015 Out of Home Pre-Vocational (HSW)
  - All per diem codes
2. With this, NorthCare requires that:
  - a. Each sub-contract provider follows Medicaid documentation standards including the documenting of start and stop times in their provider record, and
  - b. Each CMHSP must have a written audit plan addressing how they will ensure proper and adequate documentation including, but not limited to:
    - i. start and stop times coincide with units billed,
    - ii. no overlapping service times are recorded by sub-contractor and/or CMHSP,
  - c. Each CMHSP must provide evidence of sub-contract providers audit findings, plans of correction, etc. as requested by NorthCare.
  - d. If issues warrant, the edit on start and stop times may be enabled, at any time, by NorthCare.
3. Each service provider must maintain a service/clinical record for each person served. All CMHSPs must ensure that clinical documentation complies with NorthCare and Medicaid documentation standards. A CMHSP contracting and paying for services must have mechanisms in place to ensure that the sub-contractor complies with CMHSP, NorthCare, and Medicaid documentation standards.

PROVIDER	DOCUMENTATON	SAL
I. Services Provided by CMHSP Staff in off-site locations	1. Services must be clearly documented in ELMER and meet documentation standards. In order to do this: <ol style="list-style-type: none"> <li>a. Services may be documented directly in ELMER as required, or</li> <li>b. Service documentation may be scanned into ELMER, or</li> <li>c. Service logs w/multiple consumers may remain at service site. However, they must be audited through documented audit process. Logs for individual consumers must be scanned into ELMER record.</li> </ol>	<ol style="list-style-type: none"> <li>a. Created SAL</li> <li>b. Scanned Document SAL</li> <li>c. Extended SAL as defined above.</li> </ol>

<p>II. CMHSP direct run residential services - Personal Care and Community Living Support Services (Day)</p>	<p>1. Services must be clearly documented in ELMER and meet documentation standards. In order to do this:</p> <p>a. Service logs w/multiple consumers may remain at service site. However, they must be audited through documented audit process. Logs for individual consumers must be scanned into ELMER record.</p>	<p>a. Extended SAL as defined above</p>
<p>III. Services Provided by Staff of Sub-Contract Providers</p>	<p>1. Services must be clearly documented in the provider record and meet documentation standards. To do so any of the following options may be used:</p> <p>a. Service documentation may be scanned into ELMER thereby available for review and verification, or</p> <p>b. The CMHSP primary provider or designee may be assigned to review service documentation in the sub-contract provider/CMHSP off-site record and record in ELMER that they have reviewed and certify that services are being provided in accordance with services authorized in the IPOS, including appropriate amount, scope, duration, start and stop times, or</p> <p>c. The CMHSP may have a documented process for monitoring and verifying that sub-contractors are providing services in accordance with the authorized IPOS, including amount, scope, duration, start and stop times, and that includes ensuring no overlap in service.</p>	<p>a. Claims Management</p> <p>b. Claims Management, or Created SAL</p> <p>NOTE: Documented Audit Process may be submitted to NorthCare and/or available at time of annual site review.</p>

**METHOD(S) OF MONITORING:**

NorthCare Site Review

**REFERENCES:**