

# Behavioral Health

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**WELCOME !!!**



# Providing Behavioral Health Services



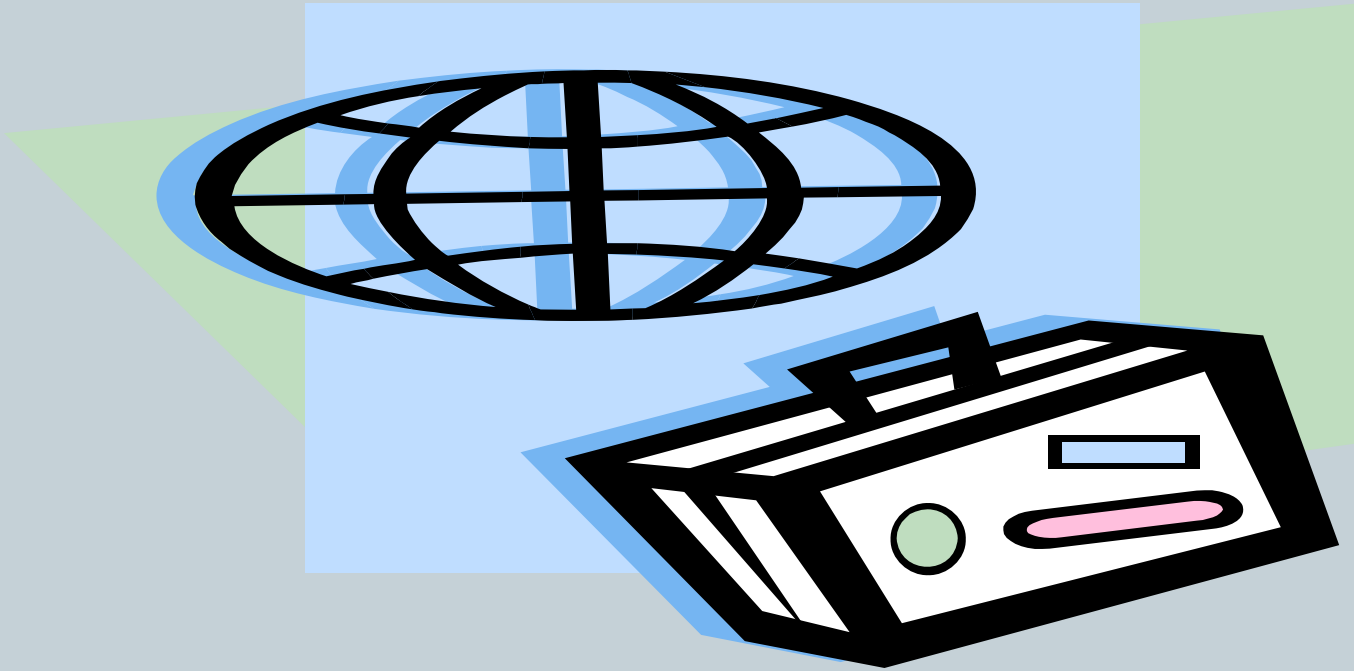
**THE WORLD CHANGED !!!**



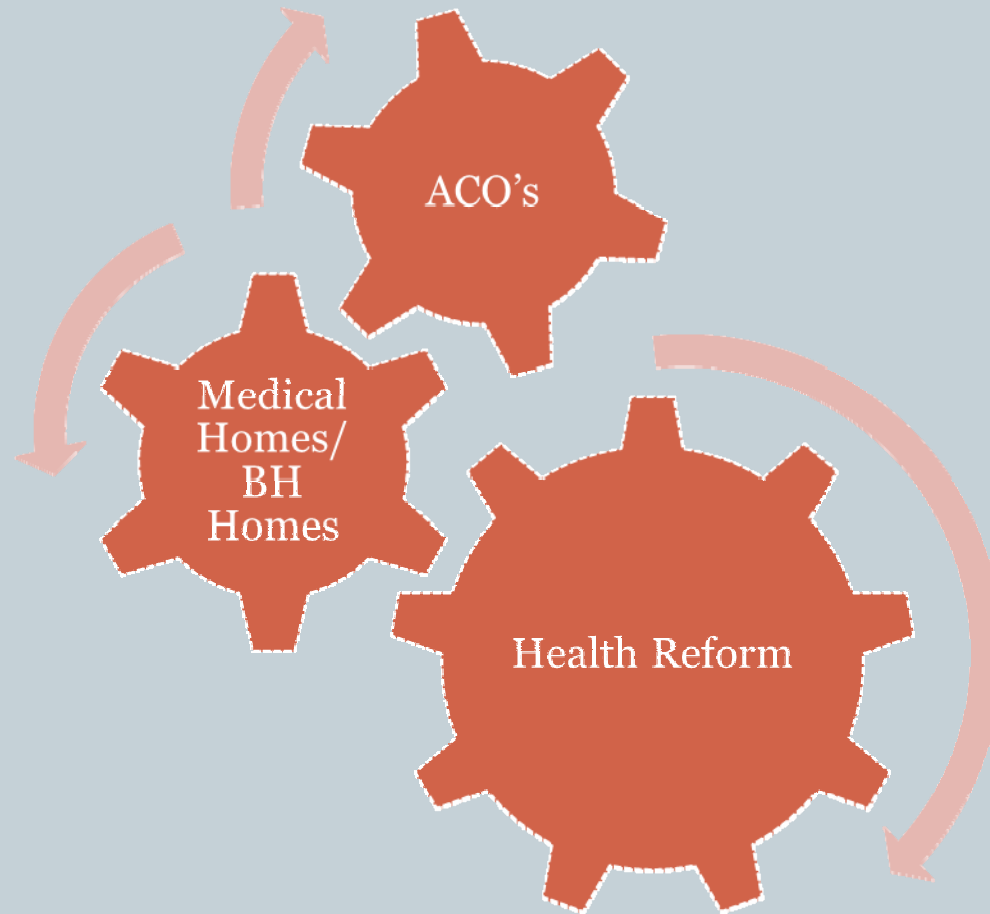
# Pack your Bags !!!



- You can not longer do what you have always done.....



# Health Reform in the Works



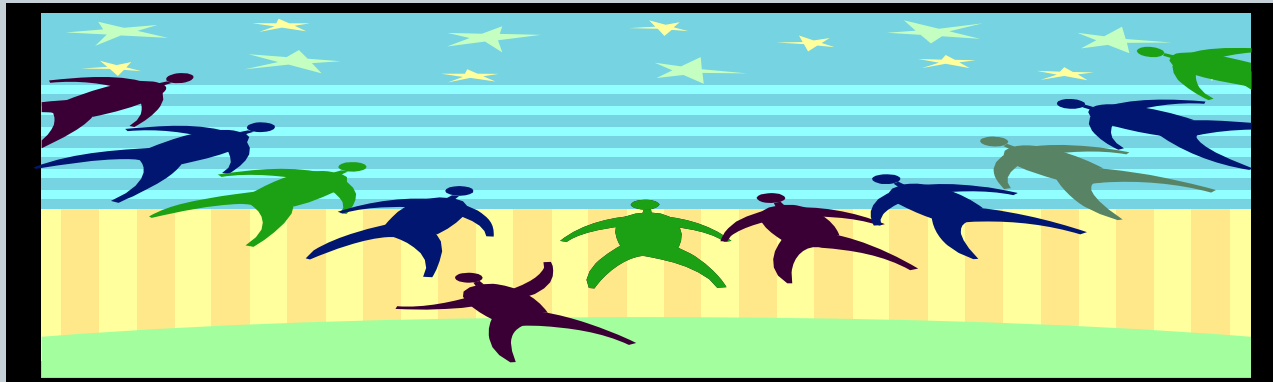
Technology- Using it to solve problems  
How can the system solve this problem ?



# Starting to Think Differently



- The mental health field failed to train staff for today's practice- how can we train our workforce ?
- Focus is only on individuals
- Care is too expensive
- Quality doesn't meet the cost



# Triple AIM



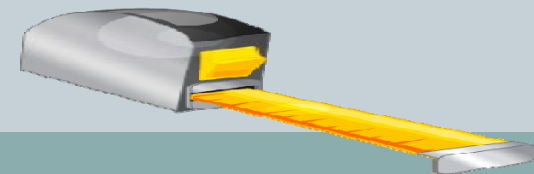
- Improve Patient experience
- Decrease Costs
- Improve Quality



# How Do We Measure Up?



- What are some clinical outcomes we currently track, and how do we do it?
- Do we track patients and populations ?
- How do we track the quality of patient experience?
- Name a new piece of information that would be helpful for tracking a quality measure of population management

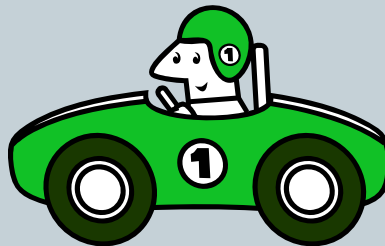
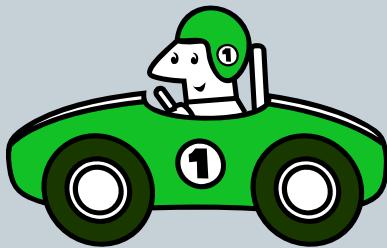
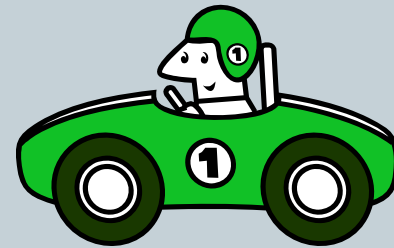




# What do I Need to Do ?



- Concurrent Documentation
- Treatment Planning
- Transdisciplinary Care
- Clinical Necessity
- Population Management
- **AND YOU ARE OFF TO THE RACES !!**



# The “Holy Grail” of Documentation?



- **Fast and easy to perform**
- **Completed in a timely manner**
- **Preferred by clinicians and clients**
- **Guides clinical activity and episodes of care in a rational direction**



# What is the Concurrent Documentation Model?

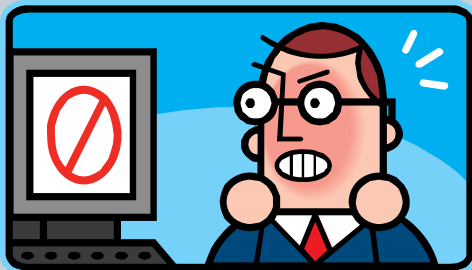


- There is no *single* model
- Common element is that the model should support the recording of services on the appropriate forms at:
  - During the service for diagnostic assessments, psychosocials, treatment plans and updates
  - At the end of the service for progress notes  
("1<sup>st</sup> 5 and last 5")

# Common Reactions



- The computer is an “intrusion” into the therapeutic process
- Documentation “takes up the client’s time” in the session
- I am afraid of what the client will think if they know what I write in my notes about them



## But...



- The computer can be seen as a tool in the therapeutic process – a collaborative effort between therapist and client
- Concurrent documentation is not a waste of the client's time, but rather creates *more* time for them to reflect on their progress in treatment
- Sensitive clinical issues can be restated without any effect being lost:  
“Client is upset about changes in meds” rather than “Client continues to be demanding and difficult to please”

# Concurrent Documentation



**A WIN-WIN-WIN!!**



- Improved clinician quality of life
- Improved compliance – timeliness and clinical necessity!
- Improved capacity
- Improved patient engagement in care
- Improved treatment outcomes

# Treatment Planning



- The patient has to know where the bus is going- Why am I in treatment ?
- Treating symptoms and diagnosis
- Documentation of Improvement
- Required



# Treatment Planning



- **90 Days-without fail !!!**
- **Goals and Objectives**
- **Modified with each change-psychosocial, diagnostic or modality**
- **Matches axis 1 and problem list**
- **Doable, measurable , achievable**



# Clinical Necessity-



- Required for payment
- Must talk about diagnosis-DSM
- Review and assess symptoms –DSM
- Document Clinical Intervention
- Reference Plan
- The 3 E's !



# What is Difference and Why !!



- **Psychotherapy Note**
- **Progress Note**

# Why Documentation Matters!



- Remember that if clinical necessity is not documented in assessments, treatment plans, and progress notes, it *doesn't exist!*
- A good test is to read your own documentation and ask yourself:
  - 1) Would you pay out of your own pocket for that service?
  - 2) Could “anyone” provide that service?

# The Documentation Linkage



```
graph TD; A[Psychosocial Assessment] --> B[Treatment Plan]; B --> C[Progress Notes];
```

Psychosocial  
Assessment

Treatment Plan

Progress Notes

# The Documentation Linkage



## Psychosocial

- Diagnoses
- Strengths/Challenges
- Assessed Needs/Personal Goals

## Treatment Plan

- Goals and Objectives
- Should link to assessed needs and goals from initial assessment

## Progress Notes

- Interventions
- Clinical progress



# Most Common Deficiencies\*



## *Psychosocial Assessments:*

- Not enough symptom information in assessment to support diagnosis
- Not capturing clinical baselines
- No documentation that clients were given the opportunity to identify their own goals for treatment

\*Based on NYSCRI regulatory review

# Continued...



## *Treatment Plans*

- Not completed within required timeframes (90 days)
- Goals are not clearly related to assessed needs
- Interventions not included

## Continued...



### *Progress Notes*

- Not tied to treatment plans in a meaningful way
- No documentation of skilled interventions provided
- No documentation of clinical progress (symptom resolution, etc.)



# Conclusions



- Documentation compliance matters because it stems from quality, patient-centered care (and also happens to be mandated by several regulatory bodies!)
- Episodes of care should show a clear and clinically meaningful progression
- Best supported through use of concurrent documentation to encourage client engagement in progress

# Contents



- Reason for visit- diagnosis
- Review of symptoms-if its not in the DSM don't put it here !!!
- Clinical Interventions- if its not evidence based don't put it here
- Plan-progress towards treatment plan goals

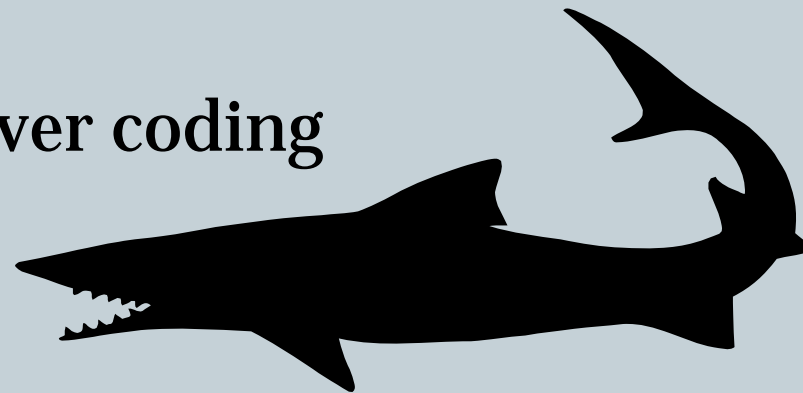
# OMIG



Treatment plans

Clinical necessity

Coding –under and over coding



# Tools What is the Big Deal ?

- Common Language
- Measureable
- Reportable



# Why set up a compliance program?



- ▶ To comply with all federal and state laws
- ▶ Compliance = best possible care for patients
- ▶ To stay in business!
- ▶ If a problem arises, having a compliance program in place can help!



# What makes up an effective compliance program?



- **Compliance Officer**
- **Policies and Procedures**
- **Training**
- **Communication Lines**
- **Internal Monitoring/Auditing**
- **Responding appropriately to reports**
- **Disciplinary procedures**
- **Whistleblower Protection**

# Where Organizations Go Wrong



- Registration of patients
- Billing and coding
- Claims for services not rendered
- Claims containing known false information
- Clinical necessity
- Confidentiality violations
- Management of grants
- Whistleblower protection
- Conflicts of Interest



# What you can do TODAY!



- **Make sure you have comprehensive policies in place**
- **Know where you stand – do a risk assessment**
- **Add to your CQI process**
- **Implement an “open door” policy**
- **Make sure your staff are providing the best possible care (and documenting it)**



# Compliance Resources



- **OIG website – <http://oig.hhs.gov>**
- **OMIG website – <http://www.omig.ny.gov>**
- **National Council Compliance Watch Newsletter  
<http://www.thenationalcouncil.org> – search for  
“compliance”**
- **Health Care Compliance Association (HCCA)  
<http://hcca-info.org> – sample job descriptions,  
“Compliance Today” newsletter**

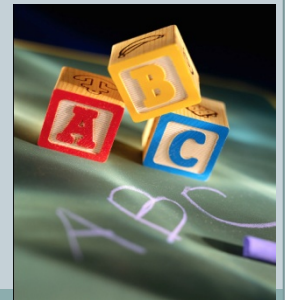


# Education and Training



- All team members need to be trained-not to become experts- but to know enough about what other team members do ....

A mental health provider should know about chronic medical illnesses to understand basic care and implications for mental health service delivery , treatment and planning



# Transdisciplinary team based care planning

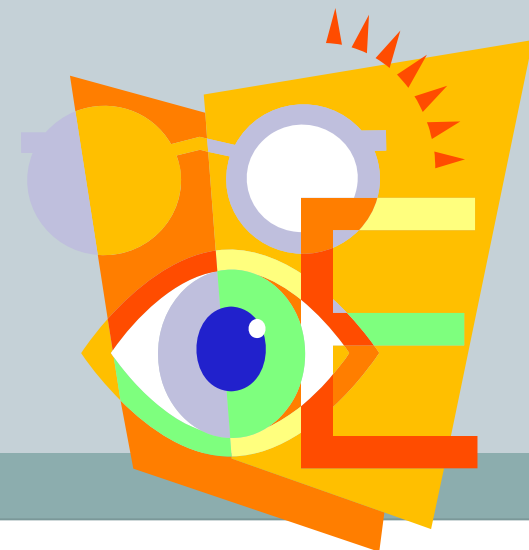


- Longitudinal care planning- care planning across disciplines on the team
- Care plans that involve the patient as a member of the treatment team
- Reinforcement of care plans .....

*Every Problem*

*Every Discipline*

*Every Time*



# *PCMH Framework*

- 9 Core Measures
- Critical Elements



- **Practice's 3 Clinically Important Conditions**

- **Clinically Important Condition:** A chronic or recurring condition that must be behavioral health related.

- **Data Sources**

- Worksheets, procedure, numbers, screenshots, procedures, meeting minutes, or supporting documentation.



# 2011 PCMH Standards



- **6 Standards**

- Enhance Access and Continuity
- Identify and Manage Populations
- Plan and Manage Care
- Provide Self-Care and Community Support
- Track and Coordinate Care

## “Must Pass” Elements

Access during office hours

Use of data for population management

Care management

Support self-care process

Track referrals and follow up

- Implement continuous quality improvement

It's a balancing act....

