HEALTHWEST

Policy and Procedure

No. 10-011

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Jackie Farrar

Provider Network Manager

Approved by: Subject: Clinical and

Support Services Documentation

DocuSigned by:

Kich Francisco

AA7FB**Rich**oFarancisco Executive Director

I. POLICY

It is the policy of HealthWest to require all contracted Providers to maintain demographic, clinical service, and support service documentation which comply with HealthWest standards for content, signature, authentication, and timeframes.

II. <u>PURPOSE</u>

The purpose of this policy is to assure all records of persons receiving services are routinely maintained in a manner which facilitates appropriate and coordinated care and meets requirements for reimbursement.

III. APPLICATION

All contracted Providers of HealthWest.

IV. PROCEDURE

A. HealthWest staff will assure contract/Provider Manual includes requirements for compliance with applicable standards including but not limited to Medicaid, MDHHS Service Standards, HealthWest Policies and Procedures, and the Department of Health and Human Services Requirements.

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B. Designated HealthWest staff will monitor compliance as defined below.

Note: HealthWest may delegate to its TJC, CARF, or COA-accredited affiliates and providers the responsibility for compliance and monitoring of their subcontracted Providers including Licensed Independent Practitioners, and may require the use of HealthWest methods/tools.

Provider	Requirements	Provider Evidence	Review Schedule	Monitoring Method
Accredited Providers (TJC, CARF, COA only)	Must meet Medicaid, Michigan Department of Health and Human Services requirements, and any additional requirements defined in HealthWest policy or contract.	Full Accreditation Report. Full Licensure Report. Self or External Record Audit Reports. Staff Training Documents. Plans of Correction or Performance Improvement.	At Application/ Re-Application. Quarterly and Performance Indicator. Unscheduled. Adverse Incident.	HealthWest staff review of evidence. May include on-site record audit.
Non-Accredited Providers	Same as above.	Full licensure report. HealthWest Record and Compliance Review. Self/External Record Audits using Payor tool. Staff Training Documents.	Same as above with probable site review.	HealthWest staff on-site record and evidence review.
Licensed Independent Practitioners	Same as above; specific reference to HealthWest Policy No. 06-015.	Record Review Documents. Staff Training Documents as required.	Site/Record Review unless subcontracted by TJC/CARF/COA- accredited Provider.	On-site record evidence review or review of accredited report and/or contract.

C. Consequences for Non-Compliance

HealthWest staff will:

1. Notify contract Provider of non-compliant findings.

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- 2. Require plan of correction with timeframes.
- 3. Review corrective actions until full compliance is achieved.
- 4. HealthWest may withhold payment or terminate contract for non-compliance.

VI. <u>REFERENCES</u>

CARF: Behavioral Health Standards Manual.

Department of Health and Human Services: Licensing Requirements.

Department of Health and Human Services Administrative Rules and Service Standards/Provider Manual.

HealthWest Policy/Procedure: No. 06-015: Documentation Standards; No. 05-008: Authentication and Modifications of Documents in the Clinical Record; and No. 06-010: Medication Management.

JF/hb