

ACCOUNTABLE BEHAVIORAL HEALTH ALLIANCE

Note: Accountable Behavioral Health Alliance, hereinafter referred to as "ABHA".

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| Policy No. 040 | Encounter Data Submission and Compliance | | |
| Original Policy Date: | 9/14/06 | | |
| Revision History: | Approved by Governing Board May 14, 2009 | | |
| Cross References: | <ol style="list-style-type: none"> 1. MHO Contract, Exhibit D: "Encounter Data Minimum Set Requirements" 2. Deschutes County Mental Health Encounter Project Policy 3. Medicaid Integrity Program 4. Federal False Claims Act (FCA) 31 USC 3729-3733 5. Oregon Revised Statutes 165.690 ORS 165.690, 165.692, 165.694, 165.696, 165.698 6. GOBHI Encounter Data Training Manual | | |
| PURPOSE: | <p>To accurately and completely document and report all member encounter data within the time limits outlined in the MHO Agreement.</p> <p>To ensure that ABHA is in compliance with the MHO Agreement, the Medicaid Integrity Program and the False Claim Act (FCA)</p> <p>Qualitative aspects of services provided to ABHA members are addressed in the following ABHA policies: ABHA Quality Management Plan ABHA Utilization Management Plan</p> | | |
| POLICY: | <p>ABHA will support county partners and contracted providers in efforts to improve/increase/ensure the accuracy and complete documentation of encounter data. ABHA capitation can only be used for services that benefit ABHA members.</p> <p>Components of this policy include:</p> <ol style="list-style-type: none"> 1. Encounter data training and certification 2. Tracking of encounter data using ABHA management reports 3. Full participation in statewide effort by all MHOs to improve encounter data reporting 4. Regular updates and monitoring of unit costs following standardized calculation methods. 5. Validation and auditing of encounter data | | |
| PROCEDURE: | <p>1) Encounter Data Training and Certification</p> <p>ABHA will develop a consistently high level of knowledge and practice among County mental health programs, providers and support staff to ensure that:</p> <ol style="list-style-type: none"> 1) Clinical and support staff are fully and accurately documenting billable services to OHP clients and 2) Agencies are using cost rates that accurately reflect all appropriate costs of services to those OHP clients. <p>ABHA will contract with a training consultant to provide regular trainings. Initially, all staff involved in the service delivery and billing processes related to OHP as well as their supervisors and managers will participate in a mandatory training to enhance knowledge and skill. This training will be offered periodically for new employees or those needing recertification. Recertification is required every 2 years. ABHA will work with county encounter data liaisons to plan and coordinate trainings.</p> <p>ABHA will provide access to a regularly updated electronic manual on which the trainings are based.</p> | | |

Staff is to use this manual as a reference to answer questions regarding proper use of encounter codes.

On an ongoing basis ABHA will monitor the effectiveness to its training program and make improvements to it based on these efforts.

The initial training session will be followed by a written test to measure the effectiveness of the training and each participant's understanding of the training material. All staff, managers, and administrators **MUST** pass an encounter data certification test. ABHA will communicate who has and who has not passed the test administered at the ABHA level trainings. County contacts will follow up with those staff that did **NOT** pass the test, provide necessary tutoring, and retest. This process will continue until staff member can pass test and be "certified". County contacts will maintain list of who has been certified. ABHA will provide certificates to all staff who become certified.

2) Tracking of Encounter Data using ABHA Management Reports

Agencies who submit encounter data to ABHA or its TPA will be expected to provide a service level or "value" that coincides with the amount of OHP funding received by that county. ABHA will provide reports to agencies on a quarterly basis to help them track performance.

As part of its quality improvement efforts, ABHA will annually set targets to help us move towards achieving this goal of accurate and complete data reporting. Agencies that do not come within 90% of reaching its target will develop action plans and submit them to the Administrative Council. The Administrative Council will be responsible for reviewing the plan and monitoring compliance. On a regular basis, but no less than annually, the Administrative Council will report to the Governing Board on the status action plans.

On a periodic basis ABHA will conduct chart audits and consult with agency staff to identify strengths and opportunities for improvement regarding their encountering processes. ABHA staff will follow-up with counties at least annually to track and monitor local quality improvement efforts related to ABHA's findings

ABHA staff will meet with county encounter data contacts at least annually to coordinate efforts to improve encounter data quality and processes.

3) Full participation in Statewide Effort by All MHOs to Improve Encounter Data Reporting:

Oregon Mental Health Organizations have contracted with MCPP Healthcare Consulting, Inc. to assist them in improving the quality of their encounter data. In addition, MCPP will provide technical assistance and consultation to assist the MHOs to fully and knowledgeably participate in discussions with the state regarding the setting of capitation rates. It is expected that as a result of this process action plans for each MHO will be developed to fulfill its responsibilities. As part of this collective effort, ABHA will make good faith efforts to review and improve its internal operations, as well as business and clinical models in order to accurately and completely document and report encounter data to the state.

4) Regular updates of unit costs following standardized calculation methods

A) Conduct costs studies on a yearly basis based on budget

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| | <ul style="list-style-type: none"> • Studies will be conducted on a date to be determined by each agency. Agencies will notify ABHA upon each implementation of new rates. • Unit service costs need to be both “accurate” and pass the “sniff test” of being perceived as reasonable by an actuary. • Cost studies must be conducted in a consistent manner using the most current tool provided by MCPP Healthcare Consulting, Inc., ABHA will provide MCPP Healthcare Consulting, Inc. with copies of completed cost studies so that they can be rolled up into one statewide cost study and then reported to the state’s actuary. <ul style="list-style-type: none"> • Note: Agencies fee/rate schedules must be consistent with their cost studies. The fees they charge uninsured clients can be adjusted using a sliding fee scale so that these charges do not act as a barrier to access. • The study will be completed in a manner that is consistent with each agencies cost accounting methodology and produce an accurate financial picture of service delivery in each organization. There is no one model of service delivery that fits for all. <p>B) Encountering of non-AMH approved codes: Clinicians will make best efforts to find a “reasonable” fit between services that are provided and AMH approved encounter codes. If a reasonable fit is not found, the service should not be encountered (but will be documented in the clinical record).</p> <p>ABHA and counties will make efforts to identify those services delivered that cannot yet be encountered. ABHA will take this feedback and advocate with State for addition of these codes to the list of those that have been formally approved.</p> <p>This information will also be used to identify below the line diagnoses for services that are being provided and not encountered as well as to identify and address other encounter related issues.</p> <p>C) Prevention, Education, and Outreach (PEO) Services: ABHA and its partner counties will report PEO services consistent with the requirements under the MHO agreement.</p> <p>5) Validation and Auditing of Encounter Data</p> <p>On a regular basis ABHA’s Third Party Administrator will:</p> <ol style="list-style-type: none"> 1. Verify with the state that it has received the data that ABHA has transmitted. 2. Verify with each county that the complete data from each county has been received and transmitted. 3. Address and correct all data anomalies that have been identified. 4. Provide reports to assist ABHA and counties in monitoring encounter data and understanding utilization patterns |
| Form(s): | |

May 14, 2009

Date Approved by the Governing Board