



San Francisco Department of Public Health Office of Compliance and Privacy Affairs

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Re: Resuming 2020 Audit Cycle – SFDPH BHS Compliance

Dear Providers,

The past few months have been challenging for us all. Your efforts to ensure that our clients' needs continue to be met have been phenomenal. I want to thank you all for working diligently to continue to provide services during the COVID-19 pandemic.

In early April 2020, the Behavioral Health Services Compliance Unit suspended our 2020 audit cycle, and we worked to be a resource to help you navigate the rapidly-changing flexibilities to regulations issued by the Department of Health Care Services. As we move into a gradual phased reopening of the City, the BHS Compliance Unit will resume its 2020 audit cycle on August 1, 2020.

I know that audits can be stressful at the best of times, and I want to assure you that our goal is to continue to provide education and guidance for your documentation when we resume our reviews. As we move to restart our audit cycle we will conduct them with the following guidelines:

- All providers will be notified at least 30 days prior to the audit.
- All mental health audits will be conducted as desktop reviews to minimize the intrusion into your daily work. While there may be some requests for documents to capture documentation that may be missing from AVATAR, we will only do that when absolutely necessary.
- For SUD audits, we may need to request access to your electronic health record in order to conduct the desktop review. Where we are unable to access your EHR, we may need to request paper records.
- The audits will be conducted using our revised audit tools (attached) which reduced the areas of review by Compliance.
- We will make findings that will be communicated to you in a clear and concise manner, and work with you to develop a reasonable plan to address any deficiencies with the focus on improvement.
- We will make our best attempts to audit only open claims.

The BHS Compliance team will continue to be a resource on how the various flexibilities apply and how to document services during this time. Please contact us with any questions you may have regarding the audit cycle, and thank you again for your ongoing and continuing support you have provided to the San Francisco community.

Sincerely,

A handwritten signature in black ink, appearing to read "Garrett Chatfield". The signature is stylized with a large initial "G" and a long horizontal stroke.

Garrett Chatfield,
Deputy Director, OCPA, and Interim BHS Compliance Officer