MEMORANDUM

DATE: September 15, 2011

TO: Jo Robinson, MFT, Director.
Community Behavioral Health Services

FROM: Chona Peralta, LCSW, DPH Compliance Officer

SUBJECT: Plan of Care

I had requested clarification from the State Department of Health Care Services (DHCS), Program Compliance regarding what included planned services is allowed during the initial assessment phase. Below are the guidelines given by DHCS:

1. The San Francisco Mental Health Plan (SFMHP) is authorized to specify the length of the "assessment period." This is the length of time providers have in which to complete the assessment process. This is an issue separate from when the client Plan of Care needs to be completed. The SFMHP has established a 30 day assessment period for children, and a 60 day assessment period for adults.

2. If there is NO initial client Plan of Care in place, only the following services should be claimed: ASSESSMENT, CRISIS INTERVENTION, and PLAN DEVELOPMENT.
If planned services are needed during the assessment phase, there must be a Plan of Care established and in place. Remember: Client Plan of Care can always be amended. Any planned services provided at any time MUST be covered by a Plan of Care.

3. In order to bill planned services, a client Plan of Care, **COMPLETE WITH CLIENT SIGNATURE** indicating client participation in the formulation of the plan, must be in place.

Without a client Plan of Care in place, there is no way to determine whether the interventions’ being billed actually addresses the functional impairments which result from the covered diagnosis, which was established during the assessment.

Cc: Barbara Garcia, Director of Health
    Kathy Murphy, Deputy City Attorney