



ALCOHOL, DRUG & MENTAL HEALTH SERVICES
MARYE L. THOMAS, M.D., DIRECTOR

Quality Assurance Office
2000 Embarcadero Cove, Suite 400
Oakland, California 94606
(510) 567-8100 / TTY (510) 533-5018

Memorandum

Date: November 8, 2010

From: Marye Thomas, MD, Director, ACBHCS

To: ACBHCS County and Organizational Providers of Outpatient Services
cc: Kyree Klimist, MFT, Quality Assurance Associate Administrator, ACBHCS

Re: Initial Client/Treatment Plan – Change in Deadline from 30 to 60 Days

As of November 1, 2010, **The Initial Client/Treatment Plan is now due within 60 days from the InSyst episode opening date, instead of 30 days, for all County and organizational contract providers of outpatient services.**

Alameda County Behavioral Health Care Services (BHCS) has adopted the California Department of Mental Health (DMH) standard for the deadline by which the Initial Client/Treatment Plan must be finalized for new clients (episode open dates of November 1 and beyond).

Providers must adhere to the BHCS and DMH 60-day deadline; therefore it is now necessary to count actual calendar days, per the MHS485 report prompt and as shown in the following example:

- **Example:** If the client's InSyst episode opening date is 9/13/10, the Initial Client Plan must be completed and finalized with a licensed LPHA signature within 60 days, or by the end of 11/11/10.
- Initial Client Plans may always be completed before the 60-day deadline.
- Providers may choose to retain the 30-day deadline.

Impact on Medical Necessity Documentation: As always, if services other than Assessment (or related Collateral/Plan Development services) are provided prior to the completion of the Initial Assessment document, the medical necessity rationale for those services must be addressed in each related Progress Note. This is because the Initial Assessment document is what establishes medical necessity for services.

All other clinical record document requirements remain the same; only the timing of the Initial Client Plan has changed.

- Initial Assessments are still due within 30 days of the InSyst episode opening date.
 - Full Service Partnership (FSP) & identified brief service programs: Initial Assessments are still due within 60 days of the episode opening date.
- Ongoing Annual Client Plans remain the same; still created/finalized in the month prior to the anniversary of the episode opening date, on an annual basis.



- Ongoing Client Plan Updates (aka 6-Month Updates) remain the same; still created/finalized in the month prior to the next six-month period of authorization/treatment.
- Note to Full Service Partnership (FSP) programs: FSP programs are no longer required to create a 30-day Interim Client Plan. There is still no requirement for FSP's to create 6-Month Client Plan Updates.

If you have questions, please contact the Quality Assurance Office at 510-567-8105.

