# **Section 1: Participating Entity Information**

| Name | Lake County Behavioral Health Services |
|------|--|
|      |  |

### **PRIMARY CONTACT**

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|----------------------|----------------------------------|
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## **BACKUP CONTACT**

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|---|------------------------------|
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### Section 2:

### **Goal 1: Payment Reform**

### Instructions

Please provide key deliverables and the action steps necessary to achieve each deliverable using the tables below.

**Deliverables:** DHCS includes deliverables as examples; a participating entity may replace these with their own deliverables, or add new deliverables, as long as they lead to meeting the goal by the deadline. Deliverables labeled **required** are required for all participating entities.

**Action Steps:** These are to be defined by the participating entity – what tasks need to be completed to meet the deadline for the deliverable?

### Milestone 1a:

Implement new CPT/HCPCS procedure codes, modifiers, place of service codes, and taxonomy codes.

| Due Date | Required Deliverables (as developed by DHCS)   | Deliverables Developed by Entity   | Action Steps  |
|----------|--|--|---|
| 9/30/22  | Participating entity to provide own deliverable Example: Contract amendments completed with vendor(s); implementation plan complete. | Enter into a Participation<br>Agreement with<br>CalMHSA for the Semi-<br>Statewide EHR project<br>and CalMHSA provides<br>an attestation that work is<br>in process. | <ul> <li>Sign Participation         Agreement with CalMHSA         to participate in the Semi-         Statewide Enterprise         Health Record initiative.</li> <li>Inform relevant         stakeholders (including         Board of Supervisors) and         prepare budget requests         as needed.</li> <li>CalMHSA will work with         EHR vendor to implement         new code set including</li> </ul> |
|          |  |  | <ul> <li>project timeline, scope and budget.</li> <li>CalMHSA and EHR vendor submit signed attestation to</li> </ul>  |

|        |   | DHCS.  |
|--------|---|--|
| 3/1/23 | Required Submit boilerplate contracts for subcontracted providers that reflect the new code set and claiming requirements | <ul> <li>Identify categories of<br/>contract boilerplates<br/>impacted by CPT code set<br/>and claiming requirement<br/>changes (i.e., inpatient vs<br/>outpatient vs residential,<br/>etc.).</li> </ul> |
|        |   | <ul> <li>Identify areas of relevant<br/>subcontractor boilerplates<br/>impacted by CPT code set<br/>and claiming requirement<br/>changes.</li> </ul>   |
|        | ¥1  | Identify disseminated guidance on CPT code set and claiming requirement changes (including CalMHSA documentation guides, CPT coding guide, Coding Q&A webinars) and populate into relevant boilerplates. |
|        |   | Distribute resulting draft boilerplates to relevant stakeholders (compliance, counsel, contractors) for review and revision.   |
|        |   | <ul> <li>Finalize drafts and submit<br/>to DHCS.</li> </ul>  |
|        |   | Utilize CalMHSA     boilerplate drafts outlining     updated code sets and     claiming requirements to     amend subcontracted     provider boilerplate and     submit to DHCS.                         |
| 3/1/23 | Required Submit CPT code training plan, including information   | Create a training plan,     utilizing CalMHSA role-     specific CPT code training   |

|               | on availability of<br>training for<br>subcontracted<br>providers and county<br>staff. |     | materials and/or create/obtain alternate training materials. Plan to include county and contracted staff.  |
|---------------|---|-----|--|
|               |   |     | Match staff and contractor to the relevant CalMHSA training resources (i.e. clinical training vs technical training) or alternate training and communicate attendance requirement to staff/contractors.                |
| *             | 20  | ig. | • Follow up with staff/contractors to ensure compliance with training requirement.   |
|               |   |     | Provide list of     staff/contractors requiring     training to CalMHSA.   |
|               |   |     | Collaborate with CalMHSA to ensure communication to staff/contractors.   |
|               |   |     | Utilize CalMHSA Learning Management System (LMS) to obtain reporting on training completion rates for staff/contractors. CalMHSA will provide trainings on LMS system and county specific reports of who has attended. |
| 9/29/23       | Required<br>Minimum   |     | 1. CalMHSA will:   |
|               | submissions:  |     | • Identify period for  |
|               | 1. At least 10  |     | submitting test claims   |
|               | claims that pass the  |     | system and alert vendor to timeframe.  |
|               | Strategic   |     |  |
| DHCS 8761 (12 | National  |     |  |

- Implementa tion Process (SNIP) edit.
- 2. At least 10 DMC claims that are approved. (including DMC-ODS or DMC claims).
- 3. At least 10 SMHS claims that are approved.

- Ensure loading of CPT codes and other relevant changes have occurred in the EHR prior to testing.
  - Assign relevant staff to DMC claim trouble shooting and error correction tasks.
- Submit no fewer than ten claims during testing period.
- Work any resulting errors in coordination with EHR vendor and DHCS until successful submission of ten claims.

### 2. CalMHSA will:

- Identify period for submitting test claims system and alert vendor to timeframe.
- Ensure loading of CPT codes and other relevant changes have occurred in the EHR prior to testing.
- Assign relevant staff to DMC claim trouble shooting and error correction tasks.
- Submit no fewer than ten claims during testing period.
- Work any resulting errors in coordination with EHR vendor and DHCS until

| successful submission of ten claims.  |
|---|
| 3.,   |
| CalMHSA will:   |
| Identify period for submitting test claims system and alert vendor to timeframe.                              |
| Ensure loading of CPT codes and other relevant changes have occurred in the EHR prior to testing.             |
| Assign relevant staff to SMHS claim trouble shooting and error correction tasks.                              |
| Submit no fewer than ten claims during testing period.  |
| Work any resulting errors in coordination with EHR vendor and DHCS until successful submission of ten claims. |

## Milestone 1b:

Update county claiming systems and successfully submit 837 transactions to the Short-Doyle Medi-Cal (SD/MC) claiming system for county-operated and subcontracted SMHS and DMC-SP/DMC-ODS services.

| Due Date | Required Deliverables (as developed by DHCS)             | Deliverables Developed by Entity   | Action Steps  |
|----------|--|--|---|
| 9/30/22  | Participating entity to provide own deliverable Example: | Assess changes needed to claiming system and incorporate in IT contract. | <ul> <li>CalMHSA will provide<br/>updated CPT code set<br/>including procedures,</li> </ul> |

|        | Assess changes needed to claiming system and incorporate in I.T. contract                                       | modifiers, place of service codes and taxonomies to the EHR vendor to populate the claiming system.  |
|--------|---|--|
|        |   | CalMHSA will ensure that<br>EHR vendor contract<br>addresses relevant CPT<br>code and claiming<br>requirements and timeline.   |
| *      | E   | CalMHSA will managed     EHR vendor contract to     ensure work is completed     in accurate and timely     manner and that counties     receive needed     professional services per     participation agreements.  |
| 3/1/23 | Required Document or attest to analysis of new rates and progress on rate/contract negotiations with providers. | <ul> <li>Participate in CalMHSA         Cost Survey effort by:         <ul> <li>completing cost surveys for directly operated services</li> <li>collaborating with relevant contractors to complete contracted cost surveys</li> <li>utilizing relevant CalMHSA technical assistance (training documents, webinars, etc.).</li> </ul> </li> <li>Utilize above information and cost reports to analyze impact of new CPT code rates on revenue and other relevant metrics.</li> </ul> |

|         |  | <ul> <li>Establish new codes and rates for subcontractors.</li> <li>Initiate conversations socializing new codes/rates.</li> <li>Initiate contract negotiations.</li> <li>Engage CalMHSA to produce a County Revenue Projections based upon analysis of 837 claims data to estimate future revenue post Payment Reform go live.</li> <li>Utilize CalMHSA projection scenarios to identify suboptimal business practices and initiate</li> </ul> |
|---------|--|---|
| 9/29/23 | Required Submit documentation that all new claiming rates have been loaded into county systems | remediation plans.  CalMHSA will:  Establish and implement timeline for loading new rates into EHR system in collaboration with EHR vendor.  Establish and implement quality assurance and testing strategies.  Submit attestation to DHCS that all new claiming rates have been loaded into county system.   |
| 9/29/23 | Required Submit contract execution schedules for all network providers requiring               | Identify all contracts to update/amend to implement updated codes and rates.  |

| contract updates which may occur on a rolling basis through FY 2024- 25. | <ul> <li>Identify contract end dates<br/>for all relevant contracts<br/>and determine priority<br/>ranking for executing<br/>updated contracts.</li> </ul> |
|--|--|
|  | Liaise with contractors,     Board of Supervisors and     other relevant parties to     establish contract     execution schedule.                         |
|  | Submit schedule to DHCS.   |

Milestone 1c: Implement new Intergovernmental Transfer (IGT) agreement protocol

| Due Date | Required Deliverables (as developed by DHCS)                  | Deliverables Developed by Entity                         | Action Steps   |
|----------|---|--|--|
| 9/30/22  | Participating entity to provide own deliverable               | Develop IGT training plan for all relevant stakeholders. | <ul> <li>Identify county staff and<br/>contractors to be trained on<br/>IGT Protocols.</li> </ul>  |
|          |   |  | <ul> <li>Create a training plan,<br/>utilizing CalMHSA IGT<br/>training and/or<br/>create/obtain alternate<br/>training materials.</li> </ul>              |
|          |   |  | <ul> <li>Communicate training<br/>requirement to staff.</li> </ul>   |
| 3/1/23   | Required Submit Policies & Procedures and/or BHP guidance for |  | <ul> <li>Review standardized IGT<br/>P&amp;P developed and<br/>provided by CalMHSA.</li> </ul>   |
|          | county fiscal staff to support new IGT protocol.              |  | <ul> <li>Identify County procedures<br/>that require updating and<br/>assign resources and a<br/>responsible party to<br/>enacting the changes.</li> </ul> |
|          |   |  | Revise standardized P&P to conform with County   |

|         |  |      | preference and route to relevant parties for review   |
|---------|--|------|---|
|         |  |      | (Compliance, Counsel).  |
|         |  |      | <ul> <li>Submit finalized IGT P&amp;P<br/>to DHCS.</li> </ul>   |
| 9/29/23 | Required Submit documentation that all IGT agreement |      | <ul> <li>Ensure relevant staff have<br/>been trained in IGT<br/>protocols.</li> </ul>   |
|         | protocols have been implemented.                     |      | <ul> <li>Ensure accounting systems<br/>and budgets have been<br/>updated as needed to<br/>implement IGT protocols.</li> </ul> |
|         | w  | \$ a | <ul> <li>Ensure IGT P&amp;Ps have<br/>been enacted.</li> </ul>  |
| 40      |  |      | <ul> <li>Submit attestation that IGT<br/>agreement protocols have<br/>been implemented.</li> </ul>                            |
|         |  |      | <ul> <li>Provide list of<br/>staff/contractors requiring<br/>training to CalMHSA.</li> </ul>                                  |
|         |  |      | <ul> <li>Collaborate with CalMHSA<br/>to ensure communication<br/>to staff/contractors.</li> </ul>                            |
|         |  |      | <ul> <li>Utilize CalMHSA Learning<br/>Management System<br/>(LMS) to obtain reporting<br/>on training completion</li> </ul>   |
|         |  |      | rates for staff/contractors. CalMHSA will provide trainings on LMS system   |
|         |  |      | and county specific reports of who has attended.  |

### Section 3:

## Goal 2: Implementation of CalAIM Behavioral Health Policy Changes

### Instructions

Please provide key deliverables and the action steps necessary to achieve each deliverable using the tables below.

**Deliverables:** DHCS includes deliverables as examples; a participating entity may replace these with their own deliverables, or add new deliverables, as long as they lead to meeting the goal by the deadline. Deliverables labeled **required** are required for all participating entities.

Action Steps: These are to be defined by the participating entity

### Milestone 2a:

Implement standardized screening tool in compliance with DHCS guidance.

| Due Date | Required Deliverables (as developed by DHCS)                                       | Deliverables Developed by Entity | Action Steps  |
|----------|--|----------------------------------|---|
| 9/30/22  | Required Document training plan for all relevant MHP, DMC, or DMC-ODS staff (e.g., |                                  | <ul> <li>Identify staff that will utilize<br/>the standardized screening<br/>tools and that require<br/>training.</li> </ul>  |
|          | access line and MHP intake staff) on screening tool.                               |                                  | <ul> <li>Arrange for all applicable<br/>staff to attend the trainings<br/>provided by CalMHSA<br/>(including subcontract<br/>providers).</li> </ul>   |
|          |  |                                  | Provide anticipated completion dates that staff will access/complete trainings.   |
|          |  |                                  | Utilize CalMHSA Learning     Management System     (LMS) to obtain reporting     on training completion     rates for staff/contractors.     CalMHSA will provide     trainings on LMS system |
|          |  |                                  | and county specific reports of who has attended.  |

| 3/1/23  | Required Submit records documenting percentage of relevant staff trained on use of the standardized screening tool. | <ul> <li>Identify the preferred method for tracking staff training attendance.</li> <li>Track and retain documentation of all screening tools training attendance (county provider and subcontract provider).</li> <li>Ensure a training plan is in place for any staff who have not received screening tools training.</li> </ul>  |
|---------|---|---|
| 3/1/23  | Required Submit policies and procedures that describe use of standardized screening tools.                          | Review standardized screening tools P&P developed and provided by CalMHSA.  Ensure the standardized screening tools P&P is stored in accordance with all other county P&Ps.  Ensure the P&P is accessible to all stakeholders, including subcontract providers.  Utilize CalMHSA Learning Management System (LMS) to obtain reporting on training completion rates for staff/contractors. CalMHSA will provide trainings on LMS system and county specific reports of who has attended. |
| 9/29/23 | Required Submit reports showing outcome of screening tool (e.g., percentage of callers                              | CalMHSA will:  • Ensure vendor has all requirements of screening tools including report   |

| referred to the MHP,<br>DMC- SP, DMC-ODS<br>vs MCP) | development specifications.   |
|---|---|
|   | <ul> <li>Ensure relevant<br/>changes/setups have<br/>occurred in the EHR and<br/>test reports.</li> </ul> |
|   | Submit reports on behalf of counties that illustrate screening tools outcomes.                            |

Milestone 2b: Implement standardized transition tool in compliance with DHCS guidance.

| Due Date | Required Deliverables (as developed by DHCS)  | Deliverables Developed by Entity | Action Steps   |
|----------|---|----------------------------------|--|
| 9/30/22  | Required Document training plan for all relevant MHP, DMC or DMC-ODS staff and subcontracted providers. |                                  | <ul> <li>Identify staff that will utilize the standardized transition tools and require training.</li> <li>Arrange for all applicable staff to attend the trainings provided by CaIMHSA (including subcontract providers).</li> <li>Utilize CaIMHSA Learning Management System (LMS) to obtain reporting on training completion rates for staff/contractors. CaIMHSA will provide</li> </ul> |
|          |   |                                  | trainings on LMS system and county specific reports of who has attended.   |
| 3/1/23   | Required Submit records documenting percentage of relevant staff and providers trained on use of the    |                                  | Utilize CalMHSA Learning     Management System     (LMS) to obtain reporting     on training completion     rates for staff/contractors.     CalMHSA will provide     trainings on LMS system  |

|         | standardized transition tool. Attestations from subcontractors will suffice as evidence of training participation.                |   | <ul> <li>and county specific reports of who has attended.</li> <li>Track and retain documentation of all transition tools training attendance (county provider and subcontract provider).</li> <li>Ensure a training plan is in</li> </ul> |
|---------|---|---|--|
|         |   |   | place for any staff who have not received transition tools training.   |
| 3/1/23  | Required Submit initial reports showing tracking of referrals to and from MCPs, using the   | C | Alert vendor to reporting timeframe.   |
|         | transition tool,<br>showing closed-loop<br>referrals.   |   | <ul> <li>Ensure relevant<br/>changes/setups have<br/>occurred in the EHR and<br/>test reports.</li> </ul>  |
|         |   |   | <ul> <li>Submit reports on behalf of<br/>counties that illustrate<br/>transition tools outcomes.</li> </ul>  |
| 9/29/23 | Required Submit reports showing tracking of referrals to and from MCPs, using the transition tool, showing closed-loop referrals. | C | • Coordinate with EHR vendor to address any applicable standardized transition tools implementation challenges and ensure accuracy of transition tools reports.  |
|         |   |   | <ul> <li>Submit reports on behalf of<br/>counties that illustrate<br/>transition tools outcomes.</li> </ul>  |

Milestone 2c:
For DMC Only: Implement ASAM criteria to determine level of care in compliance with DHCS guidance.

| Due Date | Required Deliverables (as developed by DHCS)   | Deliverables Developed by Entity | Action Steps   |
|----------|--|----------------------------------|--|
| 9/30/22  | Required Document training plan for all relevant DMC staff and subcontracted providers.                  |                                  | <ul> <li>Inform all stakeholders of the new requirement for ASAM criteria to be implemented to support level of care determinations.</li> <li>Identify all staff (including subcontracted providers) that require ASAM training as well as who will develop/provide training.</li> <li>Provide anticipated dates that staff (including subcontracted providers) will access/complete the trainings.</li> </ul> |
|          |  |                                  | <ul> <li>Utilize the ASAM trainings<br/>provided via CalMHSA.</li> </ul>   |
| 3/1/23   | Required Submit records documenting percentage of providers trained on use of the ASAM criteria. Include |                                  | <ul> <li>Identify the preferred<br/>method for tracking staff<br/>training and shall retain<br/>documentation of training<br/>attendance.</li> <li>Notice all applicable</li> </ul>  |
|          | information about how<br>the county partnered<br>with its subcontractors<br>to support and               |                                  | subcontractors identifying<br>this training requirement<br>and training dates.   |
|          | monitor timely participation in trainings.   |                                  | <ul> <li>Ensure a training plan is in<br/>place for any staff<br/>(including subcontractors)<br/>who have not completed<br/>ASAM training (including<br/>new hires who arrive after<br/>implementation and initial<br/>training).</li> </ul>   |

| 3/1/23  | Required Submit initial reports showing tracking use of ASAM criteria to determine appropriate level of care (example using scores from the UCLA ASAM Assessment Tool to determine placement). |       | <ul> <li>Alert vendor to reporting timeframe.</li> <li>Ensure relevant changes/setups have occurred in the EHR and test reports.</li> </ul> |
|---------|--|-------|---|
| 9/29/23 | Required Submit updated reports showing tracking use of ASAM criteria to determine appropriate level of care (example using scores from the UCLA ASAM Assessment Tool to determine placement). | ⊋ is: | CalMHSA will submit<br>reports on behalf of<br>counties showing use of<br>ASAM criteria to determine<br>appropriate level of care.          |

## Milestone 2d:

Implement revised documentation standards, including but not limited to, assessment domains, problem lists, progress notes, and applicable timeliness standards

| Due Date | Required Deliverables (as developed by DHCS)   | Deliverables Developed by Entity | Action Steps  |
|----------|--|----------------------------------|---|
| 9/30/22  | Required Submit evidence of EHR changes that support documentation reform, such as vendor contracts. |                                  | Work directly with the Semi-Statewide EHR vendor to ensure that documentation reform requirements are reflected in the vendor contract. |
|          |  |                                  | <ul> <li>Ensure relevant staff<br/>are informed of<br/>upcoming<br/>documentation reform</li> </ul>                                     |

|         |  | changes (including subcontract providers).   |
|---------|--|--|
| 9/30/22 | Required Submit updated excerpts from documentation manuals, list of updated county Policies and   | Review documentation manuals and documentation standards P&Ps developed and provided by CalMHSA.   |
| ē       | Procedures, or similar evidence that counties and subcontractors have adopted the MHP, DMC or DMC-ODS revised documentation              | Ensure all documentation standards P&Ps are stored in accordance with all other county P&Ps.      Ensure all   |
|         | standards (which include but are not limited to assessment domains, problem lists, progress notes, and applicable timeliness standards). | documentation<br>standards P&Ps are<br>accessible to all<br>stakeholders,<br>including subcontract<br>providers.   |
| 9/30/22 | Required Document training plan inclusive of the new CalAIM policies listed above, and   | Notice all stakeholders of upcoming documentation reform trainings.  |
|         | participation of MHP, DMC or DMC-ODS staff and providers in training: • Include information on training made available to                | <ul> <li>Utilize CalMHSA         Learning Management         System (LMS) to         obtain reporting on         training completion         rates for         staff/contractors.</li> </ul> |
|         | subcontracted providers and describe how the county has supported and monitored timely   | CalMHSA will provide trainings on LMS system and county specific reports of who has attended.  |
|         | participation in   | Provide anticipated  |

|        | trainings for its subcontractors.   | completion dates that staff will access/complete trainings.  Ensure a training plan is in place for any staff who have not completed training (including new hires who arrive after implementation and initial training).   |
|--------|---|---|
| 3/1/23 | • Updated utilization management policies • Updated audit, oversight and recoupment policies, procedures and protocols to comply with new specialty mental health services criteria, assessment domains, documentation standards and other CalAIM behavioral health policies, aligned with new DHCS auditing and recoupment standards • Documentation of communication/training with providers. | Review P&Ps developed and provided by CalMHSA.  Ensure P&Ps are stored in accordance with all other county P&Ps.  Ensure all relevant P&Ps are accessible to stakeholders, including subcontract providers.  Provide anticipated completion dates that staff will access/complete trainings.  Ensure a training plan is in place for any staff who have not completed training (including new hires who arrive after implementation and initial training).  Review and submit |

|         | 3.Ks   | staff training<br>attendance data<br>provided via<br>CalMHSA's LMS.   |
|---------|--|---|
| 9/29/23 | Required High-level summary of audit results, including total funding amounts recouped from providers, by reason for recoupment (per DHCS policy, limited to evidence of fraud waste and/or abuse; with corrective action plans and/or other administrative sanctions used for noncompliance with documentation and other compliance standards). | <ul> <li>Notice stakeholders who will be responsible for revising UR business rules and audit protocols/tools and prepare to report on all internal audit findings following the most recent DHCS Annual Review Protocol guidelines with focus on fraud, waste and abuse and with corrective action plans and/or other administrative sanctions used for noncompliance with documentation and other compliance standards</li> <li>Stakeholders to collaborate to determine the preferred method of ensuring audit feedback is provided expeditiously to providers (including subcontract providers) and shall ensure that corrective action plans are implemented and monitored.</li> <li>Provide high-level summary of audit results via the UR application created</li> </ul> |

| and provided by |
|-----------------|
| CalMHSA.        |

### Milestone 2e:

Provide guidance and training to county-operated and county-contracted providers on all new behavioral health policies, as outlined by DHCS in Behavioral Health Information Notices:

- Criteria for DMC and DMC-ODS services, including use of ASAM criteria in DMC counties, changes to diagnostic, eligibility, and medical necessity requirements, and new processes to claim Medi-Cal reimbursement for early intervention services for youth and for specified EPSDT SUD services in DMC counties.
- Criteria to access Specialty Mental Health Services (SMHS) for adults and for children (including criteria related to trauma, child welfare involvement, and homelessness)
- Mandatory screening and transition tools for specialty and nonspecialty mental health
- Documentation requirements and assessment standards (SMHS and DMC, DMC-ODS)
- No wrong door (SMHS)
- Co-occurring diagnoses (SMHS and DMC, DMC-ODS)
- Treatment during assessment period, prior to diagnosis (SMHS and DMC, DMC-ODS)

| Due Date | Required Deliverables (as developed by DHCS)  | Deliverables Developed by Entity | Action Steps  |
|----------|---|----------------------------------|---|
| 9/30/22  | Required Submit updated policies and procedures reflecting all CalAIM behavioral health policy changes listed under milestone |                                  | <ul> <li>Review all new behavioral health P&amp;Ps developed and provided by CalMHSA.</li> <li>Ensure all new behavioral health P&amp;Ps are stored in accordance with all other</li> </ul> |
|          | 2e.   |                                  | county P&Ps.  •Ensure all behavioral health P&Ps are accessible to all stakeholders, including subcontract providers.   |
| 9/30/22  | Required Document training plan inclusive of the  |                                  | <ul> <li>Inform staff of CalAIM P&amp;P changes.</li> </ul>   |

|               | new CalAIM policies                      | Identify staff that will   |   |
|---------------|--|--|---|
|               | in milestone 2e,                         | require CalAIM P&P   |   |
|               | including participation                  | training.  |   |
|               | of staff in training Include information | Arrange for all applicable   |   |
|               | on training made                         | staff to attend the trainings  |   |
|               | available to                             | provided by CalMHSA  |   |
|               | subcontract ed providers and             | (including subcontract providers).                                       |   |
|               | describe how the                         | providers).  |   |
|               | MHP, DMC, or                             | Provide anticipated  |   |
|               | DMC- ODS has supported and               | completion dates that staff will access/complete                         |   |
| 14            | monitored timely                         | trainings.   |   |
|               | participation in                         |  |   |
| à             | trainings for its subcontractors.        | <ul> <li>Ensure a training plan is in place for any staff who</li> </ul> | < |
|               | oub contractor of                        | have not completed   |   |
|               |  | training (including new  |   |
|               |  | hires who arrive after implementation and initial                        |   |
|               |  | training).   |   |
|               |  |  |   |
|               |  | Utilize CalMHSA Learning     Management System                           |   |
|               |  | (LMS) to obtain reporting  |   |
|               |  | on training completion   |   |
|               |  | rates for staff/contractors.  CalMHSA will provide                       |   |
|               |  | trainings on LMS system  |   |
|               |  | and county specific reports  |   |
| 3/1/23        | Required                                 | of who has attended.  • Review current new                               | - |
|               | Describe how new                         | employee training  |   |
|               | providers will be trained in CalAIM      | checklists and ensure that all CalAIM related trainings                  |   |
|               | policies under                           | are added and that new   |   |
|               | milestone 2e, through                    | providers (including   |   |
|               | training manuals and/or asynchronous     | subcontract providers) complete trainings                                |   |
|               | on-line learning.                        | provided by CalMHSA.   |   |
|               |  |  |   |
|               |  | <ul> <li>Ensure a training plan is in place for any staff who</li> </ul> |   |
|               |  | have not completed   |   |
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|         |   | of who has a  | ive after on and initial and initial and initial as System ain reporting ampletion are formulation and initial and in reporting ampletion are formulation and initial and init |
|---------|---|---|--|
| 9/29/23 | Required Submit updated quality improvement plan or other evidence to demonstrate how the MHP, DMC or DMC-ODS will provide ongoing training, support, and monitoring to implement the CalAIM policies under milestone 2e. | to determine method of en ongoing train and monitorin CalAIM polici  Stakeholders process of re and/or developlan for | nsible for county's QI leveloping on that will rategy for ort to collaborate the preferred suring ing, supporting of new les.  |

## Section 4:

## **Goal 3: Data Exchange**

Please provide key deliverables and the action steps necessary to achieve each deliverable using the tables below.

**Deliverables:** DHCS includes deliverables as examples; a participating entity may replace these with their own deliverables, or add new deliverables, as

long as they lead to meeting the goal by the deadline. Deliverables labeled <u>required</u> are required for all participating entities.

**Action Steps:** These are to be defined by the participating entity – what tasks need to be completed to meet the deadline for the deliverable?

Milestone 3a: Demonstrate improved data exchange capabilities.

Option 1: Demonstrate direct sharing of data with MCPs

| Due Date | Required Deliverables (as developed by DHCS)   | Deliverables Developed by Entity | Action Steps   |
|----------|--|----------------------------------|--|
| 9/30/22  | Required A copy of signed data-sharing agreement between the participating entity and the MCP(s).  |                                  | <ul> <li>Review status of current data sharing agreements with local MCP(s).</li> <li>Engage local MCP(s) to update agreements as necessary.</li> <li>Engage technical teams from BHP and MCP to identify and problem-solve technical gaps and remediate to achieve data sharing agreement aims.</li> <li>Engage data teams from BHP and MCP to identify and problem-solve data gaps (dictionaries, etc.) and remediate to achieve data sharing agreement aims.</li> </ul> |
| 3/1/23   | Required A copy of a datasharing transaction log or a de-identified HL7 message (or other equivalent documentation) to and from the MCPs and participating entity. |                                  | <ul> <li>CalMHSA will:</li> <li>Identify specific HL7 message type(s) (ADT, etc.) to exchange between BHP and MCP.</li> <li>Identify project plan and timeline for exchanging HL7 messages.</li> </ul>   |

| 0/20/22 | Dominad   | <ul> <li>Identify resource challenges and remediate (staffing, software, etc.).</li> <li>Identify technical challenges to exchanging messages and remediate.</li> <li>Test HL7 message exchange capabilities and produce transaction log or de-identified HL7 message and submit to DHCS.</li> </ul>   |
|---------|---|--|
| 9/29/23 | Required Submit a written report (DHCS to provide a template) outlining how the participating entity is leveraging direct data exchange with MCPs to improve care coordination and/or to implement CalAIM or other population health management programs. | <ul> <li>Design intervention(s) to reach improvement goals.</li> <li>Propose and support Multi-County PIP.</li> <li>Identify target care coordination/CalAIM/PHM goals to improve via direct data exchange.</li> <li>Collaborate with MCPs to identify baseline data and improvement goals.</li> <li>Design intervention(s) to reach improvement goals.</li> <li>Submit written report to DHCS documenting efforts.</li> </ul> |

Option 2: Demonstrate onboarding to a Health Information Exchange (HIE)

| Due Date | Required Deliverables (as | Deliverables Developed by Entity | Action Steps |
|----------|---------------------------|----------------------------------|--------------|
|          | developed by DHCS)        |                                  |              |

| 9/30/22 | Required: A copy of signed California Data Use and Reciprocal Support Agreement (CalDURSA) and California Trusted Exchange Network (CTEN) to onboard with HIE that has done the same. |     | <ul> <li>Submit existing signed CalDURSA and CTEN demonstrating onboarding to an HIE with the same signed agreements. OR</li> <li>Identify HIE(s) with signed CalDURSA and CTEN participation</li> <li>Of the above, identify the HIE with the greatest overlap of lives with the BHP.</li> </ul>  |
|---------|---|-----|--|
| u.      | 40  | · · | Onboard with HIE Onlywit arms fairned.   |
|         |   |     | <ul> <li>Submit copy of signed<br/>CalDURSA and CTEN<br/>agreements to DHCS.</li> </ul>  |
| 3/1/23  | Required A copy of a transaction log or a de-identified HL7 message (or other equivalent documentation) to and from the HIE and county  |     | CalMHSA will:  Identify specific HL7 message type(s) (ADT, etc.) to exchange between BHP and the HIE.  Identify project plan and timeline for exchanging HL7 messages.  Identify resource challenges and remediate (staffing, software, etc.).  Identify technical challenges to exchanging messages and remediate.  Test HL7 message exchange capabilities and produce transaction log or de-identified HL7 message and submit to DHCS. |

| 9/29/23 | Required Submit a written report (DHCS to provide a template) outlining how the county is leveraging | Identify target care coordination/CalAIM/PHM goals to improve via direct data exchange. |
|---------|--|---|
|         | HIE participation to improve care coordination and/or to   | Identify baseline data and improvement goals.   |
|         | implement CalAIM or other population health management   | Design intervention(s) to reach improvement goals.                                      |
|         | programs.  | Submit written report to     DHCS documenting efforts.                                  |

## Milestone 3b:

Demonstrate an active Fast Healthcare Interoperability Resources (FHIR) application programming interface (API) that will allow the participating entity to be compliant with CMS-mandated interoperability rules

| Due Date | Required Deliverables (as developed by DHCS)  | Deliverables Developed by Entity  | Action Steps   |
|----------|---|---|--|
| 9/30/22  | Participating entity to determine deliverable | Signed attestation from CalMHSA that FHIR API implementation is underway. | CalMHSA will:  Convene meeting with EHR vendor to review FHIR API requirements  Identify status of FHIR API implementation. If FHIR APIs are not in productive use, create roadmap to implementation.  Review EHR contract and amend as needed to accomplish FHIR API scope of work.  Identify external trading partner for FHIR API testing/exchange. |

|         |  | Submit attestation to DHCS     that FHIR API   |
|---------|--|--|
|         |  | implementation is  |
|         |  | underway.  |
| 3/1/23  | Required Signed attestation  | CalMHSA will:  |
|         | form from the county that certifies the                                  | Initiate testing of FHIR API.  |
|         | implementation of the  | Submit attestation of FHIR   |
|         | FHIR API.  | API implementation in test environment to DHCS.  |
| 9/29/23 | Required Submit a log of   | CalMHSA will:  |
|         | successful FHIR transactions (de- identified) over a six month period in | Collaborate with EHR     vendor to pull FHIR     transaction log                                       |
|         | 2023.  | <ul> <li>De-identify FHIR<br/>transaction log to remove<br/>PHI/PII/sensitive data.</li> </ul>         |
|         |  | <ul> <li>Submit de-identified<br/>transaction log covering a<br/>two- month period in 2023.</li> </ul> |

### Milestone 3c:

Demonstrate that the participating entity has mapped data elements to the United States Core Data for Interoperability (USCDI) standard set

| Due Date | Required Deliverables (as developed by DHCS)   | Deliverables Developed by Entity | Action Steps  |
|----------|--|----------------------------------|---|
| 9/30/22  | Required Signed attestation  |                                  | CalMHSA will:   |
|          | form and other supporting documentation from the participating entity                |                                  | <ul> <li>Review current EHR data<br/>structure and mapping with<br/>EHR vendor.</li> </ul>  |
|          | that certifies that the county has begun the process of mapping data elements to the |                                  | <ul> <li>Draft project plan to update<br/>mapping of data elements<br/>to UCSDI.</li> </ul> |
|          | USCDI  |                                  | <ul> <li>Identify amendments to<br/>EHR contract scope,</li> </ul>                          |

|         |  |  | deliverables and budget needed and execute updated agreement.  • Identify additional resources needed to achieve updated mapping, if any, and remediate.  • Submit attestation that USCDI mapping process has begun. |
|---------|--|--|--|
| 3/1/23  | Participating entity to determine deliverable  | Signed attestation form and other supporting documentation from the participating entity certifying that county has begun documentation outlining mapped data elements to the USCDI. | Begin documentation of new mapping including crosswalks, technical specifications and/or other related documents.      Submit attestation that USCDI documentation is  |
| 9/29/23 | Required Signed attestation form from the participating entity that certifies that data elements have been successfully mapped to USCDI  AND  Submit documentation outlining the mapped data elements. |  | complete.  CalMHSA will:  Ensure mapping and documentation have been completed.  Complete quality assurance/testing of the USCDI data mappings.  Submit completed documentation and attestation to DHCS.             |

### Milestone 3d:

Leverage improved data exchange capabilities to improve quality and coordination of care.

This milestone relates to the following measures:
- Follow-up After Emergency Department Visit for Alcohol and Other Drug Abuse or

## Dependence (FUA)

- o Measure specification can be found on page 63
- Follow-up After Emergency Department Visit for Mental Illness (FUM)
  - Measure specification can be found on page 70
- Pharmacotherapy for Opioid Use Disorder (POD)

  o Example measure specification can be found here.

| Due Date | Required Deliverables (as developed by DHCS)  | Deliverables Developed by Entity | Action Steps   |
|----------|---|----------------------------------|--|
| 9/30/22  | Required Submit a quality improvement plan (DHCS to provide template and assist with the provision of data to achieve this deliverable) to improve performance on FUA, FUM, and POD during the measurement period of July 1, 2022 – June 30, 2023. Quality improvement plans should include how the participating entity will leverage improved data exchange capabilities to achieve improved performance. |                                  | <ul> <li>Utilize 837 database to generate Finder File and submit to DHCS</li> <li>Receive retrospective data from DHCS and analyze performance on FUA, FUM and POD</li> <li>Establish baseline performance on the above measures.</li> <li>Convene workgroup to identify performance goals and related interventions.</li> <li>Create Quality Improvement Plan documenting goals and interventions outlining use of improved data exchange.</li> </ul> |

| 3/1/23  | Required In collaboration with DHCS, report baseline performance rate (July 1, 2021 – June 30, 2022) for FUA, FUM, and POD and provide updated narratives on projects, challenges, lessons learned, and next steps related to quality improvement on these measures during the measurement period (DHCS to provide template). | <ul> <li>Implement identified interventions in QI Plan.</li> <li>Identify data collection and analysis strategy to test interventions.</li> <li>Test performance and update interventions at intervals using Plan Do Study Act (PDSA) cycles.</li> <li>Submit report outlining baseline performance and updated performance as relevant, including challenges, lessons learned and next steps.</li> </ul> |
|---------|---|---|
| 9/29/23 | Required Submit final performance rate (July 1, 2022 – June 30, 2023) for FUA, FUM, and POD and provide updated narrative on projects, challenges, lessons learned, and next steps related to quality improvement on these measures (DHCS to provide template).   | <ul> <li>Identify method for obtaining FY2022/2023         FUA, FUM, POD data         (DHCS data         warehouse/Finder File or direct exchange with MCP/HIE with a preference for real time exchange.</li> <li>Analyze measure performance for FY2022/2023.</li> <li>Update interventions as needed.</li> <li>Provide updated narrative to DHCS.</li> </ul>  |

# **Section 5: Technical Assistance and Training**

All BHQIP participating entities are required to complete virtual trainings and technical assistance provided by DHCS or designees to support implementation of CalAIM policies. The training schedule will be communicated to counties in a separate BHIN. DHCS 8761 (12/2021)

DHCS will run reports of each participating entity participation in trainings. Participating entities are eligible to receive 100% of the available incentive per reporting period, based on completion of milestones, if at least one staff from the MHP and at least one staff from the DMC or DMC-ODS (the same individual who attended the MHP training can attend the DMC and DMC-ODS trainings) are documented to have attended at least one webinar for each BHQIP goal (either synchronously, or asynchronously). If DHCS is unable to verify attendance, the participating entity will be required to submit documentation of which staff attended on which date. If no attendance can be verified, DHCS reserves the option to deduct 5% from the incentive payment.

Please acknowledge your understanding and acceptance of this responsibility below.

I understand and accept the responsibility to participate in all three webinar trainings run by DHCS or their designees.

## **Section 6: Certification**

I hereby certify that all information provided in this IP is true and accurate to the best of my knowledge, and that this plan has been completed based on a thorough understanding of program participation requirements as specified in BHIN No. 21- 074

| Behavioral Health<br>Director's Name: | Todd Metcalf |
|---------------------------------------|--------------|
| Signature:                            | A            |
| Date Signed:                          | 2/15/22      |

Acceptance of a BHQIP award shall constitute acceptance of the terms and conditions described herein. The terms of the BHQIP award include the participating entity's IP, as approved by DHCS.