The background of the slide features a large, faint watermark of the official seal of the City and County of San Francisco. The seal is circular and contains the text "THE CITY AND COUNTY OF SAN FRANCISCO" around the perimeter. In the center, there is an eagle with its wings spread, perched atop a shield. Below the shield is a banner with the motto "EUREKA" and another banner below that with the words "ORO EN PAZ" and "FIERRO EN GUERRA".

# **Agency Audit Planning Meeting: BHS Compliance Overpayment Monitoring System**

**FY24-25**

Joseph A. Turner, PhD, CHC, Compliance Officer  
Andre Pelote, MPA, Compliance Manager  
Behavioral Health Services Compliance Unit  
San Francisco Department of Public Health

[joe.turner@sfdph.org](mailto:joe.turner@sfdph.org)

# Agenda and Objectives

Item	Objective	Time
<b>Introductions &amp; Framing</b>	<ul style="list-style-type: none"><li>• Tell us your name, your agency, your services.</li><li>• We want you to feel comfortable and to connect with others.</li></ul>	10mins
<b>Audit Processes</b>	<ul style="list-style-type: none"><li>• We work with you - - to Plan, Screen Chart Documents, Audit and finalize Corrective Actions.</li><li>• We want you to have a smooth audit process.</li></ul>	10mins
<b>Chart Materials</b>	<ul style="list-style-type: none"><li>• We show you how to assemble and securely submit the chart documents for the audit.</li><li>• We work with you to ensure the correct documents are present.</li></ul>	10mins
<b>Identify Primary Agency Contact</b>	<ul style="list-style-type: none"><li>• One point person for confirming and submitting materials.</li><li>• Any of your preferred agency staff can included for communication.</li></ul>	5mins
<b>Questions &amp; Comments</b>	<ul style="list-style-type: none"><li>• We welcome your feedback, comments and questions.</li></ul>	20mins
<b>Wrap-up</b>	<ul style="list-style-type: none"><li>• This presentation is posted on our BHS Compliance Website.</li></ul>	5mins

# **INTRODUCTIONS AND FRAMING**











# Introductions

## • Staff from BHS Compliance

- Visit our [homepage](#) on *sf.gov* page to learn more

### People

#### BHS Compliance Staff

 <p><b>Joseph Turner, PhD, CHC</b> BHS Compliance Officer Manager II</p>	 <p><b>Andre Pelote, MPA</b> Compliance Manager Principal Administrative Analyst</p>	 <p><b>Claudia Pinto, RHIT</b> Auditor Medical Records Technician Supervisor</p>
 <p><b>Khoi Dang, LCSW</b> Auditor Senior Behavioral Health Clinician</p>	 <p><b>Rita Wu, RHIT</b> Auditor Medical Records Technician Supervisor</p>	 <p><b>Carla Love- Washington, CPCS</b> Credentialing Specialist Medical Staff Services Department Specialist</p>
 <p><b>Felicia Davis, CPCS</b> Credentialing Specialist Medical Staff Services Department Specialist</p>	 <p><b>Lilia Barajas Lopez</b> Compliance Analyst Administrative Analyst</p>	 <p><b>Su Mei Ma, MPIA</b> Analyst Auditor Junior Administrative Analyst</p>
 <p><b>Teresita (Tessie) Francisco</b> Administrative Assistant Senior Clerk</p>		

# Introductions

- **Staff from Organizational Providers**
  - **If you feel comfortable, use the MS Teams Chat feature and tell group about...**
    - Your name, agency, your role...
    - The types of behavioral health services you provide...
    - The specific staff responsible for audit activities (**see slide 19**)...
    - Any questions or concerns to add to the agenda...

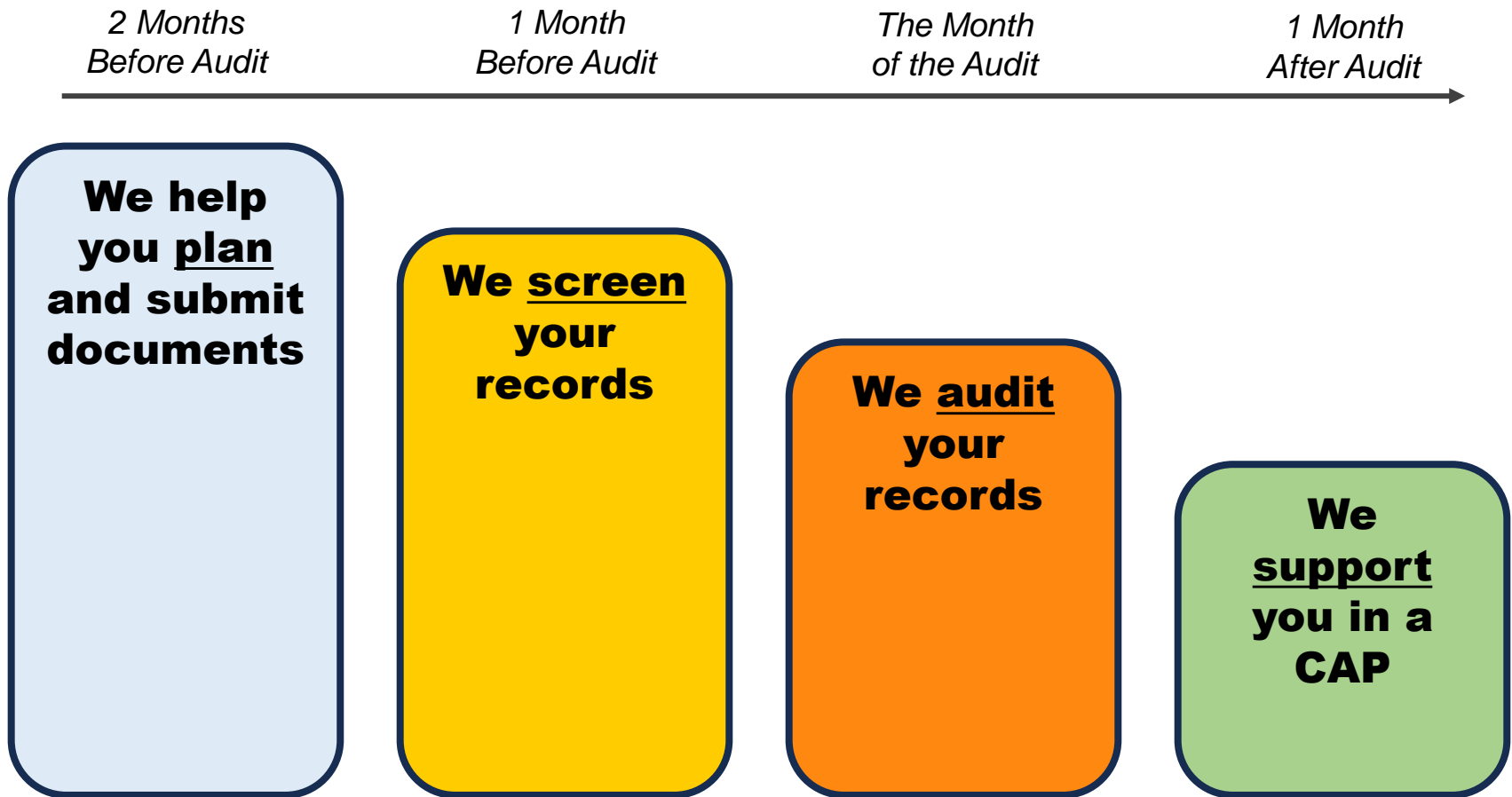
# Introductions

- **Today's Philosophy and Approach**
  - **Being “audited” could feel confusing and concerning – we want to assure that:**
    - This a routine process that we conduct with every agency annually.
    - Many of our audits show a 0% error for the agencies.
    - We only look at the core elements required for payment.
    - If a claim is disallowed for payment in an audit – we all assume the provider/agency was acting in good faith to address a real problem for the client.
    - Our processes and products are designed to be transparent – we welcome the feedback, input and wisdom that Providers can offer.

# **AUDIT WORKFLOW, TIMELINES, AND PROCESSES**

# Overview of Audit Process

- Workflow & Timeline





# Details of Audit Process

**2 months  
before**

- **BHS Compliance sends email invitation to Planning Meeting**
- **BHS Compliance facilitates Planning Meeting online**

# Details of Audit Process

1 month  
before

- **First business day of the month:** BHS Compliance emails agency to notify about the audit
- **Second business day:** Agency email BHS Compliance with “Confirmation of Receipt”
- **Third business day:** Agency submits electronic records to BHS Compliance
- **Fourth business day:** BHS Compliance screens records
- **Fifth business day:** if needed, Agency submits additional documents

“Tight Turnaround Timeline”

# Details of Audit Process

## The audit month

- **First week of the month:** BHS Compliance conducts the actual audit
- **Second week of the month:** BHS emails Preliminary Findings to Agency
- **Within 2 business days:** Agency submits response to Preliminary Findings BHS Compliance
- **By end of month:** BHS Compliance sends final report to Agency and BHS Systems

“Tight Turnaround Timeline”

# Details of Audit Process

1 month after

- **Within 30 calendar days of the audit report:** If applicable, agency backout of deficient services & submit CAP to compliance with 30 calendar days of receipt of audit report
- **Within 2 business days:** BHS Compliance communicates the approval or denial of the CAP materials

“Tight Turnaround Timeline”

# **ASSEMBLING & SUBMITTING MEDICAL RECORDS**

# How to Assemble Medical Records

- **What Materials to Submit?**

- Submit the progress note and the documents that substantiate the procedure code (service activity) claimed.

Type of Document	Examples of Chart Documents
<b>Pre-Admission Materials</b>	For example, the NTP/OTP initial medical exam
<b>Authorizations</b>	Authorization forms for services requiring central authorization (e.g., Residential, TBS)
<b>Certifications</b>	For SMHS Acute Psychiatric Inpatient Hospital Services, the physician certification statement
<b>Determinations</b>	SMHS/DMC-ODS Comprehensive Assessments and Crisis Assessments, DMC-ODS Level of Care Determination Form, other Assessment/Determination forms specific to centrally authorized services (e.g., TBS Assessment)
<b>Directions</b>	Client plans (e.g., TCM, ICC, DMC-ODS), Medication Orders (e.g., NTP-OTP), Physician's Orders (e.g., Acute Inpatient)
<b>Identifications</b>	EPSDT screening document that was completed to identify early intervention needs

# How to Assemble Medical Records

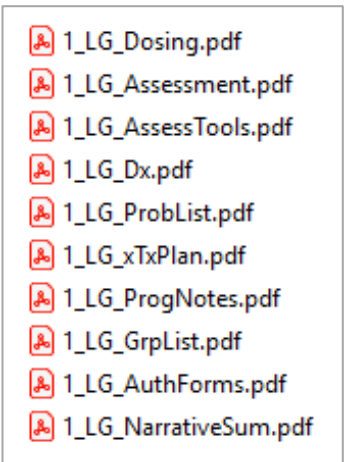
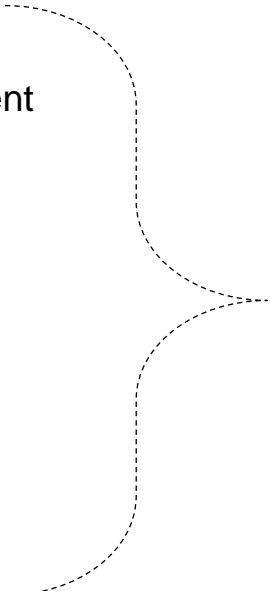
- **PDF File Format**

- Each individual document should be .pdf formatted file

- **PDF File Labelling – Example Client “LG”**

- Each file is labelled using the standard of: *Service Line#\_Client Initials\_Document*

1\_LG\_Intake Assessment  
1\_LG\_Updated Assessment  
1\_LG\_Needs Assessment  
1\_LG\_Dx  
1\_LG\_Physical Exam  
1\_LG\_TxPlan  
1\_LG\_ProgNotes  
1\_LG\_ASAM  
1\_LG\_Dosing Order  
1\_LG\_Dosing Log  
Etc.



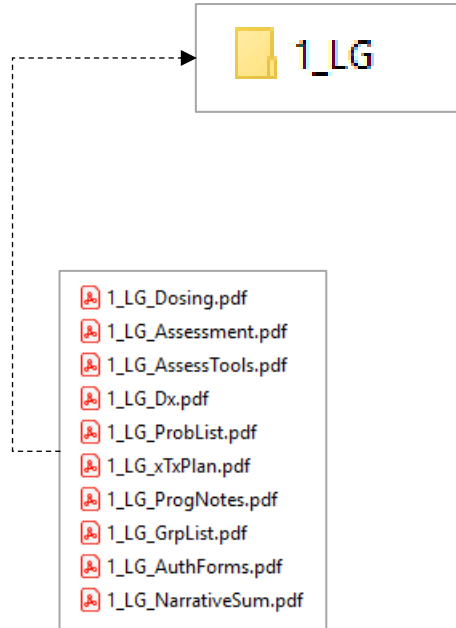
1\_LG\_Dosing.pdf  
1\_LG\_Assessment.pdf  
1\_LG\_AssessTools.pdf  
1\_LG\_Dx.pdf  
1\_LG\_ProbList.pdf  
1\_LG\_xTxPlan.pdf  
1\_LG\_ProgNotes.pdf  
1\_LG\_GrpList.pdf  
1\_LG\_AuthForms.pdf  
1\_LG\_NarrativeSum.pdf

# How to Assemble Medical Records

- **Folder Labelling & Formatting**

- The .pdf documents for each service line must be placed into an electronic folder and named using the standard of *Service Line#\_Client Initials*

- Example for client “LG”





# How to Securely Submit Files

- Option 1: Send Secure Emails and Attachments
  - Privacy and security is important here!
  - To be able to attach a folder to an email – you first must “compress” the folder – and then attach it
  - Your email system will limit the number of attachments you can add – you will need to send multiple emails
  - You must send each email as Encrypted/Secure
  - You must use a subject line that conforms to the standard of: *SECURE Chart Documents (Agency Name-FY23-24)- Email X of Y*

# How to Securely Submit Files

- Option 2: MS Office One Drive Link

- Privacy and security is important here!
- You must create an MS Office One Drive folder within your agency's system and place the file folders (compression is not required for this)
- Send a secure email to BHS Compliance with a link to the One Drive Folder
- Obtain email/phone confirmation from BHS Compliance that the materials have been downloaded to our office
- Remove/delete the MS Office One Drive folder

# **IDENTIFYING AGENCY CONTACTS FOR COMMUNICATION & AUDIT**

# Identify Primary Contact Person

- **Identify Agency Staff for Communication & Audit**
  - **One staff member for confirming/submitting**
    - Agency Name, Staff Name, Title, and email
  - **Backup staff member (planned time off, holiday, etc.)**
    - Staff Name, Title, and email
  - **Any agency staff you want to be “carbon copied” on communications**
    - Staff Name, Title, and email

**QUESTIONS, COMMENTS,  
HEADACHES, OR HEARTBURN?**

# WRAP UP & RESOURCES

- BHS Compliance [Homepage](#) on SF.GOV

The screenshot shows the BHS Compliance homepage on SF.GOV. At the top, there is a search bar with 'BHS Compliance' entered. Below the search bar, there is a 'Find jobs' button. The main content area is titled 'Behavioral Health Services (BHS) Compliance Unit' and is part of the 'Department of Public Health'. There are three main content cards: 'Routine Monitoring & Auditing', 'Provider Credentialing and Screening', and 'Communications & Education-Trainings'. A red circle highlights the 'Routine Monitoring & Auditing' card, and a red arrow points from it to the list of resources below.

**Routine Monitoring & Auditing**  
A team of auditors use structured protocols to monitor healthcare claims for overpayments, fraud, waste and abuse

**Provider Credentialing and Screening**  
A team of credentialing staff use screening and enrollment processes to verify and credential behavioral health staff and administrators

**Communications & Education-Trainings**  
Our newsletters, training materials and "frequently visited resources"

**People**  
BHS Compliance Staff

Name	Role
Joseph Turner, PhD, CSC	BHS Compliance Officer Manager #1
Andre Pelote, MPA	Compliance Manager Principal Administrative Analyst
Claudia Pinto, RHIT	Auditor Medical Records Technician Supervisor
Khoi Dang, LCEM	Auditor Senior Behavioral Health Clinician
Rita Yu, RHIT	Auditor Medical Records Technician Supervisor
Carla Levee-Washington, CPSC	Credentialing Specialist Medical Staff Services Department Specialist
Felicita Davis, CPSC	Credentialing Specialist Medical Staff Services Department Specialist
Lilia Barajas Lopez	Compliance Analyst Administrative Analyst
Su Mei Ma, MPH	Analyst Auditor Junior Administrative Analyst
Teresita (Tessie) Francisco	Administrative Assistant Senior Clerk

- Our CalAIM Overpayment Monitoring Training and Protocol
- Our Calendar of Annual Agency Audits
- Our Tools to Support Agencies (including this presentation)

# WRAP UP & RESOURCES

- **Information on DPH OCPA**
  - Office of Compliance & Privacy Affairs
    - <https://www.sf.gov/departments/dph-office-compliance-and-privacy-affairs>
- **The SFDPH Anonymous & Confidential Hotline**
  - 1-855-729-6040
  - [compliance.privacy@sfdph.org](mailto:compliance.privacy@sfdph.org)
- **Always remember that SFDPH has a Non-Retaliation policy**
  - Employee Non-Retaliation Policy (Revised 5/24/23)
    - [https://www.sf.gov/sites/default/files/2023-11/COM\\_Employee\\_Non-Retaliation\\_Policy%20%281%29.pdf](https://www.sf.gov/sites/default/files/2023-11/COM_Employee_Non-Retaliation_Policy%20%281%29.pdf)
  - City/County Controller's Office Whistleblower Website
    - <https://www.sf.gov/whistleblower-program>

**THANK YOU TO  
AGENCIES & STAFF!**