Billing Guidelines for Quality Assurance Activities

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Policy

It is the policy of the Department of Behavioral Health that quality assurance and quality improvement activities, as defined in this policy, when performed in relation to specialty mental health services provided to Medi-Cal beneficiaries, may be billed to Medi-Cal.

Purpose

To ensure standards of quality are being met or to improve the quality of a project, service or facility.

Definition

Quality Assurance and Quality Improvement activities: activities which are part of a program for the systematic monitoring and evaluation of the various aspects of a project, service, or facility which are conducted to ensure that standards of quality are being met or to improve the quality of the project, service or facility. **Quality assurance and quality improvement activities are to be distinguished from activities which provide operational or administrative support for the normal functioning of a program or service, and which are part of the usual business process of that program or service.**

Approved Activities by Clinical Staff

The following are examples of activities which **WOULD** be eligible for billing to Medi-Cal as quality assurance/quality improvement activities when performed by clinical or clinical/supervisory staff:

- Activities which support the operation of the Quality Management Committee System
- Time spent attending meetings of Quality Management Committees
- Follow-up activities which grow out of the deliberations or actions of the Quality Management Committee System
- Development of computer system which are designed to insure quality assurance and quality improvement compliance under the Mental Health Plan's contract with the State Department of Mental Health
- Time spent providing materials for or meeting with State and Federal auditors who are conducting audits to determine compliance with quality assurance requirements
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- Conducting outpatient audits specifically focusing on Medi-Cal regulations, analyzing the results of these audits, and preparing reports which summarize those results (billable only by Quality Management Division staff)

NON-Approved Activities by Clinical Staff

The following are examples of activities which **WOULD NOT** be eligible for Medi-Cal billing when performed by clinical or clinical/supervisory staff:

- Chart reviews by outpatient clinic personnel to determine agreement between Charge Data Invoice billings and service documentation
- Chart reviews by outpatient clinic personnel to determine appropriateness for payment
- Reviewing appeals of denied treatment authorization requests for inpatient stays, preparation of response letters, and logging of outcomes
- Compiling and analyzing data regarding one or more aspects of the service authorization process

Approved Activities by Clerical Staff

The following are examples of activities which **WOULD** be eligible for Medi-Cal billing as quality assurance/quality improvement activities when performed by clerical staff:

- Activities which support outpatient audits
- Activities which support operations of the Quality Management Committee system
- Time spent in gathering material for State and Federal auditors who are performing audits to determine the Mental Health Plan’s compliance with quality assurance requirements

NON-Approved Activities by Clerical Staff

The following are examples of activities which **WOULD NOT** be eligible for Medi-Cal billing when performed by clerical staff:

- Processing treatment authorization requests
- Entering information into the TAR Log
- Processing appeals and grievances