

Policy Clarification Memo

Date: UPDATED 05/07/2013

Re: Monterey County Behavioral Health Policy 129 - 72-Hour Documentation Timeline

<p>Policy/Procedure</p> <p>Stuff we really, really, really need to know.</p>	<p>All client-related services must be <i>entered and finalized</i> in the client electronic health records within 72 business hours from when the service was provided. Any other documents related to a client (i.e. CPS reports, labs, etc.) must also be entered/scanned in the client’s clinical record within 72 business hours. For entries submitted after 72 business hours of service, the documentation should include a reason for late entry. All Behavioral Health direct service staff is expected <i>enter and finalize</i> in the electronic health records a minimum of 90% of client-services documentation (i.e. progress notes) within this 72 business hour time period.</p>
<p>Clarification</p> <p>Stuff we should read. Should clear up some confusion, we think (We hope).</p> <p>YOU CAN SERIOUSLY STOP READING AFTER THIS SECTION!</p>	<p>The intent of the 72-hour documentation policy is to establish a trend of timely documentation. Timely documentation is not only about compliance with State expectations, but it is also about insuring that clinically relevant and accurate information is available for the best care of the client. Behavioral Health has defined a 90% minimum for compliance with the 72-hour documentation policy.</p> <p>However, perfection is not expected. QI recognizes that documentation cannot always be completed within 72 hours. Situations may arise that prevent timely documentation, such as sickness, client crisis, or scheduling challenges. As with any trend’s longevity, timely documentation is meant to be evaluated on a long-term basis. In cases where documentation is late, staff should document the reason for the late entry. The reason should be placed in the beginning of the progress note but should not be in extensive detail. For example, an entry such as “Late entry due to other client crisis” should suffice.</p> <p>There are often questions on how the timeline expectation applies to services that occur at the end of the business day on Fridays or the day before a holiday. Notes need to be completed within 72 business hours from when the service was provided. However, for staff working alternative or modified schedules, the 72 hour business hours includes all regular hours of Behavioral Health operation (excluding weekends and holidays) even if it coincides with a regularly scheduled day off that fall on a Behavioral Health business day. For example, staff working four 10 hour days with Fridays off must take into account that their regularly scheduled Friday off is still part of the calculations for the 72 business hours client services documentation timeline.</p>
<p>Background</p> <p>Stuff that you want to read but won’t admit to it because you’re a QI nerd at that point.</p>	<p>QI staff surveys and staff reports indicated the implementation of the 72-hour documentation policy needed clarification. We were informed through these surveys and reports that there was a belief amongst staff, supervisors, and managers that QI expected absolute, perfect compliance with the 72-hour documentation timeline and that this was causing extreme anxiety with staff. QI received reports of staff not entering documentation out of fear related to compliance with the 72 hour policy. QI also received reports of staff coming to work during their sick time off to finish their documentation in fear of what may happen if they did not.</p> <p>State regulations drive timeliness standards, which are based on the idea that documentation completed in timely fashion has greater accuracy and makes needed clinical information available for best care of the client. State guidelines and auditors’ practice established the 72-hour documentation time frame utilized in Monterey County Behavioral Health Policy 129.</p>