

**VAN BUREN COMMUNITY MENTAL HEALTH AUTHORITY  
POLICIES & PROCEDURES**

**Title:** Chart Review  
**Originated:** 12/19/06  
**Revised:** 03/24/09, 02/09/10, 4/10/12, 5/14/13

**Number:** I.06.09  
**Approved By:** Executive Team

**DIRECTIVE:** This procedure shall serve as a guide for completing chart reviews to ensure compliance with regulations and to monitor and improve the quality of clinical records. An alternate compliance staff member will complete the reviews for any staff member or program where a situation may present a conflict of interest.

**PROCEDURES:**

1. Charts to be reviewed will be chosen by the Corporate Compliance Office. A minimum of five percent of each provider/program will be targeted throughout the year (all payors).
2. Charts will be chosen randomly. The OIG RATSTATS program is utilized to randomly select claims for review for each service provider.
3. Charts from each program will be reviewed throughout the year. Corporate Compliance will complete a clinical and claims review. The compliance review will be performed without notice to the assigned provider or program supervisor. Records are reviewed for each provider and are minimally verified against the following standards:
  - Whether the service claimed is a covered service;
  - Whether the payor coverage is current and correct;
  - Whether the submitted claim matched the service provided;
  - Whether the service provided was supported in the plan of service; and
  - Whether the documentation supports the medical necessity of the service provided.A compliance review ensures that a reported service is documented appropriately; meets federal, state and 3<sup>rd</sup> party payor standards; ensures that the documentation demonstrates the medical necessity; and authorization for the service is present in the chart.
4. More comprehensive chart reviews are completed on an ongoing basis with the expectation that each direct service provider is reviewed annually. In order to monitor and determine our compliance with various rules and regulations, policies and procedures, and contract requirements, additional verification occurs during the chart review process which includes adequate completion and clinical content of the following:
  - Assessment
  - Treatment Planning
  - Medical/Psychiatric
  - Periodic Review
  - Progress Notes
  - Record Keeping
  - Discharge/Transfer
5. The review also looks for conformance to MDHHS and CARF standards and for good clinical practice. The Corporate Compliance Office will provide feedback to the service provider and to the program supervisor within 14 days from the compliance review.
6. Any corrections that can appropriately be made will be completed within 21 days by the provider.

7. The supervisor will monitor that the corrections are made.
8. Within 21 days of receiving the notice from the Compliance Office the service provider will notify the Compliance Office that appropriate corrections have been completed.
9. Chart reviews will be monitored for trends, so that changes to forms or training may be provided to increase compliance with requirements.
10. Programs should continue to conduct other less formal chart review processes already in place and may continue to perform chart reviews on more charts than those pulled through Corporate Compliance.