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| Health Care Agency Behavioral Health Services Policies and Procedures | Section Name: | Information Management |
| | Sub Section: | IRIS |
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| | SIGNATURE | DATE APPROVED |
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| Chief of Operations Behavioral Health Services | <u>Signature on File</u> | <u>8/12/15</u> |

SUBJECT: CalOMS California Outcome Measurement System (CalOMS) Integrated Records Information System (IRIS) Electronic Operational Procedures for Treatment Data Submission to Department of Health Care Services

PURPOSE:

1. To establish operational procedures for treatment data submission to DHCS of the "IRIS Electronic Treatment CalOMS" (IRIS CalOMS).
2. Allow IRIS CalOMS users to access, file and maintain IRIS CalOMS records in a consistent and standardized manner for all BHS County operated and ADAS contracted organizations, locations and sites via Orange County's Integrated Records Information System (IRIS).
3. To maintain compliance of quality and timeliness of CalOMS and patient care in accordance with the State of California Department of Health Care Services (DHCS) and Orange County Health Care Agency (OCHCA).

POLICY:

BHS will meet Federal and State reporting requirements for SUD services. BHS will comply with the privacy and security provisions of the Health Insurance Portability and Accountability Act (HIPAA) and the confidentiality requirements of title 42 Code of Federal Regulations (CFR), Part 2 and all other relevant laws and regulations.

SCOPE:

County operated and contracted substance use disorder (SUD) treatment programs.

DEFINITIONS:

CalOMS – The California Outcome Measurement System (CalOMS) is a substance used disorder treatment program outcome measurement system. Providers in County operated and contracted substance use treatment programs are required to complete information at various points during the treatment of a client. This is required by the state. Behavioral Health Services (BHS) then reports the data to the state on a specified schedule.

IRIS - Integrated Records Information System (IRIS) is the data system used to capture treatment, billing and registration information. CalOMS data is entered into the IRIS system by the treatment providers and reported to the state by BHS.

PROCEDURE:

- I. CalOMS IRIS User (CIU) shall enter into IRIS the CalOMS data as accurately as possible and in a timely manner. “Timely manner” means:
 - A. CalOMS Admission data must be entered into IRIS within 21 days of the admission date to the BHS program, free of errors;
 - B. CalOMS Annual data must be entered into IRIS within 21 days prior to or after the client’s anniversary date;
 - C. CalOMS Discharge data must be entered into IRIS within 21 days after completion or discharge (Face to Face Encounter) of the program
 - D. If the annual update falls within 30 days of the discharge, it does not need to be entered.
 - E. It is the responsibility of the CIU to ensure that the timelines are met.
 - F. IRIS reports are available to assist the Service Chief and contract Program Directors in monitoring staff compliance with this reporting requirement. Training on use of the reports is available from the IRIS Liaison team.
 - G. For contracted programs, the contract program monitor shall be responsible to include CalOMS performance as a regular discussion point during monitoring meetings.
 - H. Compliance reviews will be conducted at least twice annually by Authority and Quality Improvement Services. The results of these reviews will be provided to the Adult and Older Adult Behavioral Health (AOABH) and Children, Youth and Prevention (CYP) Directors and to the Deputy Agency Director.
 - I. It will be the responsibility of the AOABH and CYP Directors to ensure compliance with the requirements and to oversee development and implementation of a Plan of Correction if needed.
- II. Once entered into IRIS, CalOMS data will be screened by filters for errors within 2 hours during business daylight hours, every weekday.
- III. CalOMS filtered with no errors will be stored in a Batch file for bi-monthly transmission to DHCS.
- IV. CalOMS filtered with Errors will be stored in a CalOMS Error Detail Table and can be accessed in IRIS through the IRIS Explore Menu by the IRIS User. Users should access the Explorer Menu for CalOMS errors at least once per day for their CalOMS errors. IRIS Users are responsible to find and correct their facility’s and their own CalOMS errors.
- V. CalOMS Admission errors reflected in the Explorer Menu report are to be corrected within 30 days of the client’s admission date. CalOMS Annual errors are to be corrected within the 30 days prior to or 30 days after the anniversary date. CalOMS Discharge errors are to be corrected within 30 days after the discharge date.
- VI. The BHS Service Chief for county operated clinics will provide County CIUs “The CalOMS Detail Error Report” about twice per month. The contract program monitor for

contracted programs will provide contract CIUs “The CalOMS Detail Error Report” about twice per month.

- VII. CIUs will continue to correct errors until the CalOMS is successfully submitted to DHCS free from errors.
- VIII. DHCS/ITWS rejected CalOMS with errors reported will be received by the BHS IRIS Liaison team. The BHS Liaison team will review and email to the County CIU and /or their supervisor relevant CalOMS data. For Contract Provider CIUs the Liaison will email the report to the program monitors for forwarding to the appropriate CIU for correction. Returned errors from DHCS will be corrected within 5 business days from the date the CalOMS was emailed to the CIU.

IX. PROCEDURAL RESPONSIBILITIES:

A. BHS IRIS Liaison shall:

- 1) Have responsibility to train, certify and make final authorization of IRIS Users (County employees and County Contacted providers.
- 2) Provide to all IRIS Users, along with the HCA Information technology Helpdesk, professional and technical support within their scope of knowledge and job description.

B. County CalOMS IRIS Users shall:

- 1) Be trained, certified and authorized for access and use of IRIS and or IRIS electronic CalOMS.
- 2) Have knowledge and understanding of their responsibility of Federal Alcohol and Drug Program security (CFR 42), HIPAA security and all other relevant regulations and shall understand the use of prudent and responsible procedures to maintain patient confidentiality.
- 3) Enter in a timely manner as specified by DHCS policies all data entries in IRIS CalOMS as accurately as they can from their knowledge about the client, and where warranted in clinical treatment the use of professional clinical judgment.
- 4) As of June 1, 2008 County clinical staff are identified as County IRIS Users. They are responsible to enter, access, maintain, correct CalOMS Errors and Discharge clients in IRIS CalOMS.

C. County Contracted IRIS Users shall:

- 1) Be trained, certified and authorized for Access and use of IRIS and or IRIS Electronic CalOMS.
- 2) Have knowledge and understanding of their responsibility of Federal Alcohol and Drug Program security (CFR 42, Part 2), HIPAA security and all other relevant regulations and shall understand the use of prudent and responsible procedures to maintain patient confidentiality.
- 3) Enter in a timely manner as specified by DHCS policies all data entries in IRIS CalOMS as accurately as they can from their knowledge from or about the client,

and where warranted in clinical treatment the use of professional clinical judgment.

D. County Managers and Service Chiefs shall:

- 1) Ensure that appropriate staff has access to IRIS and or IRIS CalOMS, is trained, certified and authorized before entering any data in IRIS or IRIS CalOMS.
- 2) Ensure that individual staff has completed a Personnel Action Notification (PAN) form.
- 3) Indicate on each Drug Medi-Cal counselor PAN form that their NPI is verified.
- 4) Complete and sign a "Network Access Request" (NAR) for IRIS.
- 5) Email completed PAN forms to the IRIS Liaison team.
- 6) The signed NAR should be scanned and sent electronically or Faxed to the IRIS Liaison

E. County Contracted Provider Directors or Managers shall:

- 1) Ensure that appropriate staff has access to IRIS and or IRIS CalOMS. Is trained, certified and authorized before entering any data in IRIS or IRIS CalOMS.
- 2) Ensure that individual staff has completed a Personnel Action Notification (PAN) form.
- 3) Indicate on each Drug Medi-Cal counselor/clinician staff's PAN form that their NPI is verified.
- 4) Complete and sign the "Network Access Request" (NAR) for IRIS.
- 5) Email completed PAN forms to the IRIS Liaison team
- 6) The signed NAR should be scanned and sent electronically or FAXed to the IRIS Liaison Team.