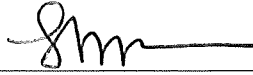


County of Marin <b>Behavioral Health and Recovery Services (BHRS)</b>	POLICY NO. BHRS-29
	Next Review Date: April 1, 2028
POLICY:  <u>SERVICE VERIFICATION POLICY</u>	Date Approved: April 16, 2025 Date Reviewed/Approved:
	By:  Todd Schirmer, PhD, CCHP Director of Behavioral Health and Recovery Services

**I. PURPOSE:**

This policy establishes a method to verify whether services reimbursed by Medicare/Medicaid (Medi-Cal) were actually furnished to Health & Human Services (HHS) BHRS members.

**II. REFERENCES:**

California Department of Health Care Services (DHCS) Provider Service Agreements and Contracts  
Title 42 C.F.R. 455.1(a)(2) and 455.20 (a)

**III. POLICY:**

HHS will adhere to the Program Integrity requirements of the Centers for Medicare and Medicaid Services (CMS), including the requirement to establish a system or process to verify whether services reimbursed by Medicare or Medi-Cal were actually furnished to members.

The BHRS Quality Management (QM) program and the Health & Human Services (HHS) Compliance & Privacy Office shall establish a process to identify, investigate, and report suspected fraud and abuse.

**IV. AUTHORITY/RESPONSIBILITY:**

BHRS Quality Management (QM), including Quality Assurance (QA) and Electronic Health Record team (EHR).  
HHS Compliance & Privacy Office

**V. PROCEDURE:**

**a. Training & Education:**

- i. The Compliance & Privacy Office shall provide compliance and privacy training, including the topics of fraud, waste, and abuse, to all HHS staff upon hire, and annually thereafter.
- ii. BHRS shall provide additional training or guidance to BHRS staff, supervisors, and billing team, that shall clarify what constitutes

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appropriate documentation and acceptable proof that a service was rendered.

**b. Auditing & Monitoring:**

- i. On a quarterly basis, BHRS EHR will generate a report from the SmartCare Electronic Health Record (EHR) of all services rendered for Medicare and/or Medi-Cal members by the BHRS Mental Health and Substance Use Services (SUS) programs for the prior three (3) months and forward to BHRS QM. The reports will be provided on the 1st day of the month following the end of each quarter.
- ii. QM will select a random sample of services (10 mental health and 10 substance use) rendered for the quarter for which service verification letters will be generated.
- iii. BHRS may choose alternative methods to verify services including calling members, utilizing sign-in sheets, etc.
- iv. QM will generate service verification letters (Attachment 1) and mail them to members or their legal representatives, along with pre-paid return envelopes.
- v. Members, or their legal representatives, are instructed to contact Quality Management if there are any discrepancies in the services indicated on the letter.
- vi. Letters determined undeliverable due to incorrect address will be forwarded to the provider to update the member's address in the BHRS EHR system.

**c. Risk Identification & Mitigation:**

- i. QM will conduct an investigation along with the HHS Compliance & Privacy Office if a member indicates that the service was not received. This process may include:
  1. Contacting the member, or their legal representative for additional information.
  2. Contacting the provider regarding the service in question.
  3. Collaborating with the billing department.
  4. Review of the service in question by QM or SUS, as applicable.
  5. Reviewing additional evidence from the provider regarding whether services were rendered (e.g., client sign-in sheets, call logs, etc.).
- ii. Findings from internal reviews/investigations shall be logged and maintained by the HHS Compliance & Privacy Office.
- iii. Services reimbursed by Medicare and/or Medi-Cal that were not received by the member will be recouped, reported and returned to CMS and/or DHCS, in accordance with overpayment regulations.

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- iv. Any indication of fraud and/or abuse will be investigated by QM and the HHS Compliance & Privacy Office, and will result in a Corrective Action Plan, that may include termination of the provider and/or contract.
- v. Any termination of a provider or contract for reasons of fraud will be reported to the Department of Health Care Services (DHCS) in accordance with the DHCS/MHP or DHCS/DMC-ODS contract.
- vi. The Compliance & Privacy Office will report any identified fraud, waste, or abuse to the DHCS Medi-Cal Fraud Control Unit via any of the following methods:
  1. Hotline: DHCS Medi-Cal Fraud Hotline (1-800-822-6222)
  2. Email: [fraud@dhcs.ca.us](mailto:fraud@dhcs.ca.us)
  3. Mail: Medi-Cal Fraud Complaint-Intake Unit, Audits and Investigations, PO Box 997413, MS 2500, Sacramento, CA 95899-7413.

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**Attachment 1.**

**Service Verification Letter template**

«letter\_date»

«First\_Name» «Last\_Name»

«Clt\_Address»

«Clt\_City», CA «Clt\_Zip»

**Re: Service Verification Letter**

Dear «First\_Name»,

The County of Marin, Behavioral Health and Recovery Services (BHRS) Division, under contract with California Department of Health Care Services (DHCS) is required to verify services provided to our clients by randomly confirming that services, which were billed to Private Insurance/Medi-Cal/Medicare, were in fact provided by BHRS and/or it's contracted agencies or healthcare providers.

As part of that random sample, the «Type\_of\_Service» provided to you by «Provider\_First\_Name» «Provider\_Last\_Name» on «date\_of\_service» was chosen for us to verify with you.

We understand that very often it is difficult to remember a specific service that was provided to you especially if it was over a month ago. If you **did** receive this service, **you do not need to do anything further.**

If you **DID NOT** receive this service, kindly return this letter to BHRS in the pre-paid, self-addressed envelope provided and check the box below.

As far as I am aware, I did not receive this service.

If you have any questions regarding this letter, please contact our Quality Management Office by using any one of the following methods:

- o Phone: 415-473-2887
- o E-mail: BHRSQM@marincounty.gov
- o Mail: Quality Improvement Coordinator  
BHRS Quality Management  
20. N. San Pedro Road  
San Rafael, CA 94903

Thank you for your assistance with this service verification request.

Sincerely,

Steve Wilbur, LMFT, CHC  
Quality Improvement Coordinator