

# Encounter Data Validation

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Advancing Healthcare  
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# Why EDV?

- Encounter data are the electronic records of services provided to MCO enrollees by both institutional and practitioner providers (regardless of how the providers are paid), when the services would traditionally be a billable service under fee-for-service (FFS) reimbursement systems.



# Why EDV?, cont.

- States use encounter data to assess and improve quality, monitor program integrity, and determine capitation payment rates.
- EDV is required by RSN's PIHP contract as Core Performance measure 2.



# Elements to Review by Contract

- Date of service
- Name of service provider
- Provider type
- Minutes of service
- Service location
- Procedure code
- Service code agrees with treatment described



# Date of Service

- Review that the service was provided on the date reported.
- Best practice: Also review the date that the progress note was written and signed.



# Date of Service, cont.

- WAC 388-877A-0120 Outpatient mental health services—Clinical record content and documentation.
  - (5) Progress notes in a timely manner and before any subsequent scheduled appointments of the same type of service session or group type, or documentation as to why this did not occur.



# Name of Service Provider

- Ensure that the name of the service provider matches what was submitted.
- Ensure that if there was a name change that it was updated in a timely manner.
- Initials are not acceptable.
- If signed by hand, the name should also be printed to ensure legibility.



# Provider Type

- Ensure that the provider type matches the clinician's signature.
- If there was a change in provider type, verify that this was updated in a timely manner.
- Ensure that the provider type is allowable for the submitted code within the Service Encounter Reporting Instructions (SERI).





# Minutes of Service

- Validate that the minutes of service that were submitted match what is on the progress note.
- Ensure that there are no non-encounterable services contained within the documentation and included in the total duration submitted.



# Minutes of Service

- If using State data, verify that services were submitted using the correct corresponding minutes or units.
- Ensure that the code is the correct code for that duration.



# Service Location

- Match whether the location matches the location submitted.
- Ensure that the location submitted matches what the documentation states.
- Ensure that the providers/RSN crosswalk is accurate.

Definitions of service location can be found:

[https://www.cms.gov/Medicare/Coding/place-of-service-codes/Place\\_of\\_Service\\_Code\\_Set.html](https://www.cms.gov/Medicare/Coding/place-of-service-codes/Place_of_Service_Code_Set.html)



# Procedure Code

- Ensure that the procedure codes match.
  - Other information in the prior slides will also assist in determining whether or not this is the correct code.



# Service Code Agrees with Treatment Described

- Does the documentation contain a clinical intervention?
- Does the documentation support an encounterable service?
- Does the documentation of the service support the code that is used?



# Bundling

Report multiple encounters occurring on the same day for the same consumer when the encounters occur at different times. With the exceptions noted below, do not roll up multiple encounters. Each service encounter must have a progress note that meets all CMS requirements.



# Bundling, cont.

Exception: If the same service is provided discontinuously to a particular consumer on a particular day by the same provider and was provided for less than the minimum time defined by the procedure/service code, the provider can roll up the minutes to a single service and report that number of units. Documentation in the client record must record these separate events and meet documentation requirements noted below.



# Bundling Example Activity

Clinician A made four phone calls regarding Client 1:

- One phone call to school counselor
- One call to parents—left voicemail
- One call to detention officer
- One call to PCP
- One email sent out





# Common Coding Issues

- Psychotherapy
  - Common issues:
    - Documentation is narrative or many quotes of what the client said in the session
    - Documentation supports another code
    - Documentation contains non-encounterable information
    - Submitting 90837 for services over 68 min



# Common Coding Issues

- Family Psychotherapy
  - Common issue:
    - Documentation supports an individual service



# Common Coding Issues

- Group therapy
  - Common issue:
    - Does not contain elements required by WAC 388-877A-0150, which states:

*“(6) Ensure group notes are recorded in each individual's clinical record before the next group meeting. Group notes must include: (a) The attendance of the individual; (b) The participation of the individual; (c) Progress towards goals stated in the individual's service plan; (d) Any significant events shared by the individual; and (e) If the group was facilitated by a nonmental health professional as described in (4) of this section, documentation the nonmental health professional was supervised by a mental health professional.”*



# Common Coding Issues

- Request for services
  - Common issues:
    - Duration is auto-filled, so that all requests for service encounters are the same duration (example:15 min.)
    - Incorrect provider type when administrative staff take the request
    - No corresponding progress note when clinical staff take the request
    - Missing elements on the documentation



# Non-encounterable Services

- Texting
- Reading or writing emails
- Listening to or leaving voicemail
- Transportation
- Playing board games or sports
- Scheduling appts
- Writing letters
- Faxing
- Calling in rx refills
- Shopping
- Internal consultation, staffing or communication



# More Non-encounterable Services

- Filling med packs without client present
- Reminder calls
- Payee services without the client present
- fishing
- Socialization
- Going to skate park or state park
- Eating lunch
- Taking out the trash



# Documentation Activity

In groups, I will assign one of the following non-encounterable activities. Your group's task is to make it an encounterable activity:

- Shopping
- Transportation
- Playing a board game
- Calling in a prescription refill



# Questions

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