

NAVIGATING BEHAVIORAL HEALTH RISKS AND CONFIDENTIALITY TOUGH SPOTS

Action Plan Example

Category	#	Name	Source	Service	Location(s)	lssue:	Action Items	Due Date	Risk Level	Status
Regulations	1	Psychotherapy	OIG Work Plan	Mental Health Psychiatrists or QHPs	Site A and Site B	Does documentation of services meet Medicare requirements?	1. Train all psychiatrists and QHPs on psychotherapy documentation 2. No claim if psychotherapy service is <16 minutes 3. Audit 10% of all psychotherapy services in August, 2019 and determine monthly rechecks	1. 5/1/19 2. 7/1/19 3. 10/1/19	High	Open
	2									
	3									
	4									
Safety	1									
	2									
	3									
Quality/ Accreditation	1									
	2									
	3									
Trends	1									
	2									