



Ohio Department of Mental Health

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DATE: 10/08/04 NUMBER: C-10-05-02 ORIGINATOR & TITLE: Howard H. Sokolov, M.D., Assistant Medical Director

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DISTRIBUTION:
 BHO's Boards Provider Agencies Shareholder Organizations

SUBJECT:
 Allocations Certification Critical Information Licensure
 MACSIS Medicaid MSPA Policy
 Procedure Other (specify):

TITLE OF CORRESPONDENCE:
Signatures and Service Authorization

CONTENT:
ODMH Certification Standards for the development of ISPs

O.A.C. 5122-27-05 contains the ODMH Certification requirements for the development of a client's Individualized Service Plan. Concerning the ISP signature requirements, O.A.C. 5122-27-05 (A) (6) states that the following must be documented:

“The signature(s) of the agency staff member(s) responsible for developing the individualized service plan, the date on which it was developed, and documented evidence of clinical supervision of staff developing the plan, as applicable”.

From the above language, it is clear that a minimum of one signature is required on the ISP. Furthermore, there is no description of the credentials required for the staff member(s) that will be signing the ISP. However, at a minimum, the Office of the Medical Director strongly suggests that if a non-licensed mental health provider or para-professional signs the ISP, that the licensed clinical supervisor signs the ISP as well. In addition to the required signatures, all providers of mental health services to the client need to be identified on the ISP.

O.A.C. 5122-27-05 (A) states in part:

“The development of the individualized service plan is a collaborative process between the client and service provider(s) based on a diagnostic assessment, a continuing assessment of needs, and the successful identification of interventions/services. ...”

From this language, it is very clear that the development of an individualized service plan should be a collaborative process between the treatment team members as well as the treatment team and the client.

The Office of the Medical Director strongly suggests that that this collaborative process between treatment team members and the client be documented. Signatures on the ISP would certainly document the collaboration, but the collaborative process could be documented elsewhere in the client record, (e.g. progress notes), or in other agency documentation.

Community Medicaid Authorization Requirements

The Ohio Department of Job and Family Service Rule O.A.C. Section 5101:3-27-02 (A) states in part:

“Medicaid covered services must be recommended by an individual who is qualified to supervise the specific service.”

The Rule clearly states that an individual's scope of practice, (under State licensure Laws), education and experience need to be considered in determining who must order services. The Rule is silent concerning where in the client record this service recommendation/authorization must be. The Department views signature(s) on the ISP as documentation of service authorization. However, authorizations for specific services may be elsewhere in the client record, (e.g. progress notes, medication/somatic treatment plans, etc.).

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REQUIRED ACTION:

None

DATES FOR REQUIRED ACTION:

NA

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