



## INTERIM INSTRUCTION NOTICE #22-001

December 29, 2022

**SUBJECT:** New Timeframes for Completion of Progress Notes

**DISTRIBUTION:** All Department  
of Behavioral Health  
and Contract Agency Staff

**OBSOLETE:** Upon completion of  
related MH and SUD  
manuals

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**Effective Date** January 1, 2023

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**From** Department of Behavioral Health (DBH) Quality Management (QM)

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**Introduction** The purpose of this Interim Instruction Notice (IIN) is to inform San Bernardino County (County) DBH staff and contract agency staff of new timeframes for documentation of progress notes. The timeframe changes apply to both Specialty Mental Health Services (SMHS) and Drug Medical Organized Delivery System (DMC-ODS) Substance Use Disorder and Recovery Services (SUDRS) and are effective immediately. This IIN supersedes IIN 21-002, and any written or verbal instructions previously issued by DBH, until outlined requirements are incorporated in the applicable DBH manual(s).

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**Progress Notes** Progress notes are used by rendering providers to document services when providing treatment. Progress notes have several purposes, including the following:

- Serve as the basis for planning care and treatment among practitioners and across programs;
- Provide a complete description of a service that can be understood independently of other notes;
- Serve as a legal record describing treatment received and providing sufficient documentation of the intervention(s) to justify payment for reimbursement;
- Provide descriptive and accurate communication to other treatment providers, and;
- Provide clear and concise description of services that may be viewed by others whom are authorization, including but not limited to, other treatment providers, the client, and/or auditors/reviewers.

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## Interim Instruction Notice 22-001, Continued

**Progress Notes:** Unless otherwise noted, the timeframes listed below include updated timeliness requirements for routine outpatient service progress notes applicable to both SMHS and DMC-ODS/SUDRS:

**Routine  
Outpatient  
Services**

Step	Action
1	Rendering provider shall enter progress notes into myAvatar (or Care POV, if applicable) on the <b>same day</b> of service when possible. Notes <b>may not be submitted any later than three (3) business days</b> from the date of service when co-signature is not required.
2	If co-signature is required, rendering provider must complete the note the same day as the service and will ensure the note is routed to the Supervisor/designee <b>no later than the next business day after the service provision.</b>
3	Supervisor/designee shall review the rendering provider's progress note(s) <b>within one (1) business day</b> of submission.
4	Supervisor/designee will either approve the progress note or reject the note if errors are identified during review.  <b>Note:</b> If progress note is rejected, proceed to <b>Steps 5 - 7</b> . If progress note is approved, proceed to <b>Step 8</b> .
5	When a progress note is rejected by the Supervisor/designee due to identified errors, the Supervisor/designee shall include comments on the progress note and reject the progress note in myAvatar. This will return the note to the provider for correction.  <b>Note:</b> Delayed or late notes shall continue to be claimed for reimbursement.
6	Rendering provider will review Supervisor/designee comments, complete all necessary revisions, document the reason the note is delayed and re-submit to the Supervisor/designee, for final approval <b>within one (1) business day</b> of Supervisor's/designee return for correction.
7	Supervisor/designee will review the revised progress note <b>within one (1) business day</b> of re-submission.  <b>Note:</b> If errors remain or new errors are identified upon resubmission, Steps 5 – 7 shall be repeated until the progress note is free of errors and approved.
8	Approved progress notes will appear as <b>Final</b> in the client's chart in myAvatar.  <b>Note:</b> Existing regulations for outpatient services with stricter timelines are not overridden by this IIN.

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## Interim Instruction Notice 22-001, Continued

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**Progress Notes:  
Crisis Services** Per the Department of Health Care Services, progress notes shall be completed within 24 hours of crisis services for both SMHS and DMC-ODS/SUDRS. The process remains the same as for routine outpatient services with the exception of the shorter timeframe.

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**Progress Notes:  
Narcotic  
Treatment  
Program (NTP)** NTPs do not have any changes to the current Federal regulations; progress notes shall continue to be completed within seven (7) business days from the date of service.

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**Weekly  
Summary** Weekly summaries are no longer required for Day Rehabilitation or Day Treatment Intensive that previously had this requirement.

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**Daily Progress  
Notes** Daily progress notes are required for services that are billed on a daily basis. Services requiring daily progress notes include Therapeutic Foster Care, Day Rehabilitation and Day Treatment Intensive.

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**Questions** For questions regarding this Interim Instruction Notice, please contact DBH Quality Management at 909-386-8227 or via email at [QualityManagementDivision@dbh.sbcounty.gov](mailto:QualityManagementDivision@dbh.sbcounty.gov).

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