



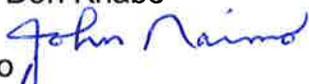
JOHN NAIMO  
AUDITOR-CONTROLLER

**COUNTY OF LOS ANGELES  
DEPARTMENT OF AUDITOR-CONTROLLER**

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November 23, 2015

TO: Supervisor Michael D. Antonovich, Mayor  
Supervisor Hilda L. Solis  
Supervisor Mark Ridley-Thomas  
Supervisor Sheila Kuehl  
Supervisor Don Knabe

FROM: John Naimo   
Auditor-Controller

**SUBJECT: DIDI HIRSCH PSYCHIATRIC SERVICE – A DEPARTMENT OF  
MENTAL HEALTH SERVICE PROVIDER – PROGRAM REVIEW**

We completed a program review of Didi Hirsch Psychiatric Service (Didi Hirsch or Agency), which included a sample of billings from Fiscal Year (FY) 2014-15. The Department of Mental Health (DMH) contracts with Didi Hirsch to provide mental health services, including interviewing Program clients, assessing their mental health needs, and implementing treatment plans.

The purpose of our review was to determine whether Didi Hirsch provided the services and maintained proper documentation, as required by their County contract and related guidelines.

DMH paid Didi Hirsch approximately \$33.7 million on a cost-reimbursement basis for FY 2014-15. The Agency provides services in the Second Supervisorial District.

**Results of Review**

Didi Hirsch did not maintain documentation to support 36 (37%) of the 97 billings reviewed, resulting in an overbilling totaling \$5,332. Specifically, Didi Hirsch did not complete Client Treatment Plans in accordance with their County contract and billed for unallowable services. In addition, for one (7%) of the 13 clients reviewed who received psychotropic medication, the Informed Consent for medication was not obtained.

Details of our review, along with recommendations for corrective action, are attached (Attachment I).

### **Review of Report**

We discussed our report with Didi Hirsch and DMH. Didi Hirsch's attached response (Attachment II) indicates they agree with our findings and recommendations and will repay DMH \$5,332. DMH management will work with Didi Hirsch to ensure our recommendations are implemented.

We thank Didi Hirsch management and staff for their cooperation and assistance during our review. If you have any questions please call me, or your staff may contact Don Chadwick at (213) 253-0301.

JN:AB:DC:EB:nj

#### Attachments

c: Sachi A. Hamai, Chief Executive Officer  
Robin Kay, PhD, Acting Director, Department of Mental Health  
Carlos E. Garcia, Board Chair, Didi Hirsch  
Kita S. Curry, PhD, President/CEO, Didi Hirsch  
Public Information Office  
Audit Committee

**DIDI HIRSCH PSYCHIATRIC SERVICE  
DEPARTMENT OF MENTAL HEALTH  
PROGRAM REVIEW  
FISCAL YEAR 2014-15**

**PROGRAM SERVICES**

**Objective**

Determine whether Didi Hirsch Psychiatric Service (Didi Hirsch or Agency) maintained documentation to support the services billed to the Department of Mental Health (DMH) in accordance with their County contract and related guidelines.

**Verification**

We selected 97 of the 21,786 approved Medi-Cal billings and 44 of the 127 approved service days claimed for September and October 2014, which were the most current billings available at the time of our review (June 2015). We reviewed the Assessments, Client Treatment Plans, Progress Notes, and Informed Consent forms in the clients' case files for the selected billings. For the Crisis Residential Program, we also reviewed the admission agreements and discharge plans. The 97 billings and 44 days represent services provided to 35 clients.

**Results**

Didi Hirsch did not maintain documentation to support 36 (37%) of the 97 billings reviewed. The undocumented billings totaled \$5,332. Specifically, we noted:

- For 14 billings, totaling \$2,721, the Client Treatment Plans did not contain a signature of the client or responsible adult. According to the DMH Provider's Manual, Chapter 1, Page 21, the client or responsible adult's signature on the Client Treatment Plan is required for the plan to be final.
- For 20 billings, totaling \$2,543, the Client Treatment Plans did not contain objectives for each type of service provided. According to the DMH Provider's Manual, Chapter 1, Page 20, a Client Treatment Plan objective is required for Mental Health Services, Medication Support Services, and Targeted Case Management Services.
- For two billings, totaling \$68, the services billed were unallowable. Specifically, Didi Hirsch billed for completing outcome measures and documenting a missed appointment. According to the DMH Provider's Manual, Chapter 1, Page 8 and DMH's "A Guide to Claiming Prevention and Early Intervention," Page 7, these services are not reimbursable.

**Informed Consent**

Didi Hirsch did not document the Informed Consent for one (7%) of the 13 clients reviewed who received psychotropic medication. According to the California Code of Regulations, Title 9, Section 851, clients shall be treated with psychotropic medications only after they have been informed by the physician of their rights to accept or refuse such medication.

**Recommendations****Didi Hirsch Psychiatric Service management:**

- 1. Repay the Department of Mental Health \$5,332.**
- 2. Ensure that Client Treatment Plans are completed in accordance with their Department of Mental Health contract and staff bill for allowable services.**
- 3. Ensure that Informed Consent is documented in the client's chart prior to treatment with psychotropic medication.**

**STAFFING QUALIFICATIONS****Objective**

Determine whether Didi Hirsch treatment staff had the required qualifications to provide the DMH Program services.

**Verification**

We reviewed the California Board of Behavioral Sciences' website and/or the personnel files for 23 (9%) of the 251 Didi Hirsch treatment staff who provided services to DMH clients during September and October 2014.

**Results**

Each employee reviewed had the required qualifications to provide the DMH Program services.

**Recommendation**

**None.**

## STAFFING LEVELS

### Objective

Determine whether the Agency maintained the appropriate staff-to-client ratio of one staff to 1.6 clients at each Adult Crisis Residential facility.

### Verification

We selected six days that Didi Hirsch billed for staff time at their Adult Crisis Residential facilities, and reviewed the staff's qualifications, timecards, and client census reports for September and October 2014.

### Results

For all six days reviewed, the facilities had the appropriate staff-to-client ratio present at all times. However, we were unable to determine if the staff present were qualified to provide services and be counted in the staff ratio at the facilities. Specifically, for one (16%) of the six days reviewed, the Agency did not maintain documentation that two staff had the minimum qualifications required. According to California Code of Regulations, Title 9, Section 532.6 (h), in a residential facility, all direct care staff shall, at the minimum, have graduated from high school or possess a GED. The Agency did not maintain proof that staff had the minimum requirement such as a copy of a high school diploma or GED.

### Recommendation

- 4. Didi Hirsch Psychiatric Service management ensure that staff-to-client ratios at their Adult Crisis Residential facilities are met as required and maintain documentation to support the staffs' qualifications.**

# Didi Hirsch

MENTAL HEALTH SERVICES

October 15, 2015

County of Los Angeles  
Department of Auditor-Controller  
Attn. Mr. John Naimo  
Kenneth Hahn Hall of Administration  
500 West Temple Street, Room 525  
Los Angeles, CA 90012-3873

**Didi Hirsch Psychiatric Service – A Department of Mental Health Service Provider Program Review**

Dear Mr. Naimo:

Didi Hirsch would like to thank you for the useful information your auditors provided. We have shared your findings with staff and emphasized the importance of being vigilant with one's documentation.

We have reviewed the findings in the draft report issued by the Audit Controller, dated September 25, 2015 which references the findings of an audit covering fiscal year 2014-15.

The findings and corrective action plans below were discussed in detail with management and supervisors of the relevant departments. The four findings have been addressed as follows:

- 1. Repay DMH \$5,332**  
Didi Hirsch Response:  
As recommended, Didi Hirsch will repay DMH \$5,332 representing the total amount of billings for which the documentation on file was not complete.
- 2. Ensure that Client Care Plans are completed in accordance with their Department of Mental Health contract.**  
Didi Hirsch Response:  
\$5,332 is owed DMH because of disallowances due to three types of errors: a) omitting a signature indicating client consent or the consent of a responsible adult; b) omitting objectives for each type of service offered and c) billing for unallowable services. These issues already are highlighted in the documentation training that all direct service staff receive in their first week of employment. The employees that made these errors have been retrained, and their supervisors have been reminded to check for compliance in these areas.

3. **Ensure that Informed Consent is documented in the client's chart prior to treatment with psychotropic medication.**

Didi Hirsch Response:

The prescriber who did not document informed consent for a client was reminded of the California Code of Regulations' requirement that all clients treated with psychotropic medications first be informed by the physician of their right to accept or refuse such medication. In addition, clinical personnel reviewed the client's chart to ensure all other required consents were present. The QA Director and Medical Director provided prescribers with a refresher, and Health Information Specialists were reminded to check for consents and to forward necessary corrections to the identified prescribers.

4. **Didi Hirsch Psychiatric Services management ensure that staff-to-client ratios for Crisis Residential facility are met as required and maintain documentation to support the staffing levels.**

Didi Hirsch Response:

The auditors indicated we had appropriate staff-to-client ratios for a Crisis Residential facility on all days audited, but they could not find proof of the appropriate education for two staff on one day. Although these staff did have the required education, upon audit we discovered that their files were missing the documentation. Since then we have reviewed all files for necessary documentation. Future employees will be required to provide proof on the first day of work. HR will conduct semi-annual reviews of staff personnel records to ensure they remain up to date with all required documentation.

If you have any questions or comments, please contact me at [kcurry@didihirsch.org](mailto:kcurry@didihirsch.org) or (310) 751-5423.

Sincerely,



Kita S. Curry, PhD  
President/CEO