



Quality Assurance Bulletin

Quality Assurance Unit

County of Los Angeles – Department of Mental Health

Lisa H. Wong, PsyD, Director

October 10, 2025

No. 25-06

UPDATE TO POLICY 401.02 CLINICAL RECORDS CONTENTS AND DOCUMENTATION ENTRY

The Quality Assurance Unit has revised Los Angeles County Department of Mental Health (LACDMH) Policy 401.02, Clinical Records Contents and Documentation Entry, to comply with Department of Health Care Services (DHCS) timelines for documenting crisis services. Clinical documentation for crisis services shall be completed within one (1) calendar day of the service being rendered (BHIN 23-068). In addition, the procedures section for Directly Operated providers has been updated to expand on what should and should not be included in the client's clinical record, particularly as it relates to critical incidents and suspected abuse reporting to comply with California Penal and Evidence Codes.

Effective as of the date of this Bulletin, Directly Operated practitioners shall no longer document within progress notes that a critical incident report (e.g., Safety Intelligence Report, Tarasoff "Duty to Protect") or suspected abuse report was made, or that staff consulted with the appropriate agency (e.g., Department of Children and Family Services (DCFS), Adult Protective Services) about possible abuse reports. California Penal Code Section 11167 states that the identity of the mandated reporter must remain confidential and California Evidence Code Section 1040 protects information obtained in confidence by public employees (including mandated reporters) as privileged. By documenting this information in the progress notes, it becomes a part of the clinical record that may be disclosed to clients or third parties. While HIPAA (45 CFR 164.512) permits disclosures to report suspected abuse, it does not require any reference to the disclosure in the clinical record. Therefore, this change is made to best protect practitioners from the inadvertent disclosure of their name as someone making a child abuse report or consulting with another County Agency about making such report.

Please note that this new directive only applies to statements about having made a report or consulting about making a report. Clinically relevant information gathered or reported by clients (e.g., client reported abuse) and care coordination activities (e.g., coordinating services with DCFS for clients involved with DCFS) shall continue to be documented within the progress notes.

Critical incident reports, completion of Tarasoff mandates, suspected abuse reports, and/or consultations about such reports shall now be documented by Directly-Operated practitioners using the Abuse Consult or Report/Critical Incident Report Log in IBHIS (refer to IBHIS Notification Bulletin No. 25-02). This form allows practitioners to document mandated reporters' duties. In addition, a new widget in IBHIS lists all critical incident or suspected abuse reports/consultations that have been submitted on behalf of the client, allowing practitioners to quickly and easily view a list of reports/consultations related to a client without reviewing multiple progress notes. Please note that the form and widget are not considered part of the client's clinical record and therefore will not be released to third parties and/or clients. Copies of suspected abuse reports shall continue to be uploaded to the Non-Disclosure Admin folder in IBHIS. Any unauthorized disclosure of Patient Health Information (PHI) necessary to complete the consult and/or report shall continue to be tracked in the Accounting of PHI Disclosures form as indicated in Policy 501.03 Accounting of Disclosures of Protected Health Information.

If directly operated or contracted providers have questions related to this Bulletin, please contact the QA Unit at QAPolicy@dmh.lacounty.gov.

cc: DMH Executive Management
DMH Administration Managers
DMH QA Liaisons
Legal Entity Executive Management

DMH Clinical Operations Managers
DMH Quality Management Division
DMH CIOB Managers
Legal Entity QA Contacts