

Monterey County Behavioral Health Quality Improvement

Re:	Restricted Disclosure in Progress Notes
Form Reference	Clinical Progress Note MC Progress Note (Group and Individual) Medication Progress Note Inpatient Progress Note MC
Initial Release Date	9/20/2024
Effective	10/1/2024

Topic

Monterey County Behavioral Health will be deploying myHealthPointe which is a web/mobile application for beneficiaries to have access to their health care information. As a result, the restricted disclosure function in the current progress notes needs to be replaced with a compatible feature.

The purpose of this memo is to outline the new procedure on how to use “restricted disclosure” in progress notes moving forward and applies to Monterey County Behavioral Health and contracted providers for mental health and substance use services.

There are circumstances which exist where a staff/provider may want to restrict the disclosure of information to the beneficiary. A restricted disclosure may be indicated, but not limited to, the following reasons:

- Progress notes documenting fulfillment of a mandated reporting obligation (e.g., suspected child abuse or elder abuse reporting) as disclosure of this information may reasonably endanger the reporting provider.
- Progress notes containing information that might reasonably endanger the life or physical safety of the person in care or another person.
- For minors, progress notes containing information that would have a detrimental effect on the provider’s professional relationship with the minor.

Procedure

1. Effective 10/1/2024
2. The current Restricted Disclosure field on progress note forms **will become inactive 9/30/2024.**
3. To continue to restrict progress notes starting 10/1/2024 staff/provider will need to follow these steps:
 - a. Select the PATID
 - b. Open the indicated progress note form
 - c. Under the prompt: Select myHealthPointe to release note to the Patient Portal OR select None to NOT release the note
 - i. Selecting **myHealthPoint** means that the **progress note will be**

- released** to the myHealthPointe
- ii. Selecting **None** means that **restricted disclosure has been activated for that progress note and will not be released** to myHealthPointe
1. When None is selected, the Reason for Not Releasing to myHealthPointe narrative field will be required
- d. Complete the progress note, finalize, and submit

Select myHealthPointe to release note to the Patient Portal OR select None to NOT release the note

myHealthPointe None

Reason for Not Releasing to myHealthPointe

Definitions

- myHealthPointe: provides beneficiaries with access to information related to their care, 24 hours a day through a secure, web and mobile-based application.
- Restricted Disclosure/Release Note: used as a mechanism to prohibit progress notes to be sent to the myHealthPoint and Health Information Exchange. Any progress note marked restricted disclosure will be reviewed by MCBH Quality Improvement (QI) staff and, if necessary, consultation with the individual provider and/or their supervisor/manager will occur prior to releasing the progress note when requested. Beneficiary access to progress notes marked restricted disclosure will be denied due to the reasons listed above however QI has the authority to overturn the restriction and provide the beneficiary the entirety of their record.
- None: selecting this will restrict the disclosure and the progress notes will not be sent to the beneficiary's myHealthPointe portal.