



Monterey County Behavioral Health Quality Improvement Memo

DATE: January 18, 2019

Memo No: 19-01

SUBJECT: Authorizations for Disclosure "WITHIN"

Topic

All information and records obtained in the course of providing services shall be confidential. A client or authorized representative shall be informed of and asked to sign the **"Authorization to Use, Exchange, and/or Disclosure of Confidential Behavioral Health Information within Monterey County Behavioral Health (MCBH) System"** ("WITHIN") at the onset of service as required by confidentiality policies, including, but not limited to Monterey County Behavioral Health Policy [350 and 351](#), [MCBH Clinical Documentation Guide](#), and [Substance Use Disorder Documentation](#) Guides. The signed "WITHIN" Authorization permits MCBH System to view health information and communicate among its programs and contracted provider programs with an aim to provide comprehensive healthcare.

Client records without a valid "WITHIN" Authorization will be considered out of policy and access to the record shall be restricted until a valid "WITHIN" Authorization is in place.

[Deadline to meet compliance with policy is Friday February 15, 2019.](#)

If after an explanation of the use of the "WITHIN" Authorization form the individual/caregiver refuses to sign, staff shall immediately contact Quality Improvement at (831) 755-4545 to request a restriction (lock) on the record. Restriction of a record will restrict the who or what information staff have access to.

The "WITHIN" Authorization does not permit the disclosure outside of its Behavioral Health System. For authorizing disclosures outside of the Monterey County Behavioral Health System, a "Authorization for Use, Exchange, and/or Disclosure of Confidential Behavioral Health Information- 'GENERAL'" shall be completed.


Procedures

- Ensure the most updated forms are being used; Both, the WITHIN and General Authorization forms, were updated on July 1, 2018.
 - Appropriately discard any previously printed BLANK forms prior to July 1, 2018
- "WITHIN and "General" Authorizations are available in Avatar.



- For Authorizations that were completed on paper
 - Open Authorization form in Avatar
 - Mark document was scanned in record
 - Scan document in to client record
- Reports showing missing “WITHIN” Authorizations
 - Care Coordinators - **Avatar report 211**
 - Supervisors - **Avatar Report 878**
 - Program Managers - **Avatar report 506**
 - This report will also display “no coordinator” assignment in the Case Coordinator column when one is missing.
 - All clients must have a Case Coordinator assigned
 - Open Avatar Case Coordinator form and assign one
- Contracted Providers may run Avatar report **211** and **506**
- A refusal of client to sign the “WITHIN” document should immediately be reported to the Quality Improvement team (415-QA@co.monterey.ca.us) or 831-755-4545 to ensure appropriate disclosure restrictions are put in place.

Excerpt from Avatar 211 report:



Monterey County Behavioral Health
211 Open Clients Missing WITHIN Authorization

This report will only show clients who are missing a Case Coordinator. It does not have a column for person who was given Case Coordinator for Disclosure. If the client does not appear under the

This section will inform whether a "within" needs to be completed.

| PATID | EP | Program | Admission Date | Coordinator | Admitting Practitioner | WITHIN prior to 07/01/18 | WITHIN after 07/01/18 | Authorization Status |
|------------|----|------------|----------------|-------------|------------------------|--------------------------|-----------------------|----------------------|
| [REDACTED] | 10 | Outpatient | [REDACTED] | [REDACTED] | [REDACTED] | None | None | Not Found |
| [REDACTED] | 18 | Outpatient | [REDACTED] | [REDACTED] | [REDACTED] | None | None | Not Found |

Total Clients: [REDACTED]

Quality Improvement will continue weekly monitoring of compliance around “WITHIN” Authorizations. Additional information on how to complete the Authorization forms can be found here: <http://qi.mtyhd.org/index.php/home/printable-documents/>. We appreciate your continued cooperation in this matter.

Respectfully,

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