

Clinical Policy: Behavioral Health Treatment Documentation Requirements¹

Reference Number: LA.CP.BH.500

Date of Last Revision: 04/25

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Description

Documentation in a medical record facilitates patient safety, decreases error, improves quality of care, and ensures regulatory and reimbursement compliance. Behavioral health services must meet specific requirements and be documented in a manner that adheres to applicable regulations, accreditation standards, and professional practice standards.

Policy/Criteria

- I. It is the policy of Louisiana Healthcare Connections that behavioral health treatment records must contain at a minimum all the following elements, as applicable, in addition to any state required components:
 - A. All entries in the treatment record are legible to another person other than the writer, dated and signed/authenticated (including licensure and/or certification) by the rendering provider prior to submission of the claim;
 - B. Each page of the treatment record must include the member/enrollee's name or another form of unique identification in accordance with BHSP Manual guidance;
 - C. Date of service (DOS) is documented at the top of each progress note or equivalent service documentation, and no less frequently than on each page;
 - D. Mental health diagnosis listed meets criteria noted in the most current version of the Diagnostic and Statistical Manual of Mental Disorders and is consistent with the following:
 1. Member/enrollee's presenting problems;
 2. Symptom history;
 3. Mental status examination;
 4. Other assessment data;
 - E. Type of service provided;
 - F. Exact start and stop times of the service are documented within the corresponding progress note or encounter record;
 - G. Reason for service (problem statement);
 - H. Each service encounter is individualized to the member/enrollee and specific date of service;
 - I. Results of required screenings, assessments, or reassessments;
 - J. Support for medical necessity that clearly outlines justification for frequency/intensity of requested services;
 - K. Treatment plan includes all of the following:
 1. Plan for ongoing treatment (i.e., plan for next sessions) is consistent with member/enrollee diagnoses;

¹ Please note, this policy applies only to Specialized Behavioral Health Services, including those found in the BHSP manual and the SBH fee schedule.

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2. Objective, measurable goals and estimated timeframes for goal attainment or problem resolution;
3. Includes a preliminary transition or discharge plan (e.g., anticipated duration of treatment, discharge goals, or criteria for referral), as applicable to the member's clinical situation and setting.;
- L. Clear clinical/therapeutic interventions and member/enrollee response to the interventions;
- M. Interventions are clearly linked to the member/enrollee's goals, behavioral health needs, and diagnosis;
- N. Interventions are related to evidence-based treatment;
- O. Summary of progress or lack of progress toward identified goals, with care plan changed accordingly to meet the current need;
- P. Discharge summary, if applicable includes all of the following:
 1. Summary of care, treatment, and services provided;
 2. Member/enrollee's condition at the time of discharge;
 3. Rationale/reason for discharge;
 4. Written discharge instructions including referrals, follow-up care, and medication regimen as applicable.

Background

*The Centers for Medicare and Medicaid Services (CMS)*¹

Documentation often serves as the primary method of communication between practitioners to ensure ongoing patient needs are met. Federal and State laws also require practitioners to maintain the records necessary to "fully disclose the extent of the services," care, and supplies furnished to beneficiaries, as well as support claims billed. Each patient encounter needs to be documented completely, accurately, and timely. Records that are not properly documented with all relevant and important facts can prevent the next practitioner from furnishing sufficient services. Unclear and inconsistent documentation can lead to unintended complications and gaps in care as well as denial of claims.

*The Joint Commission*²

The mission of The Joint Commission is to continuously improve health care for the public, in collaboration with other stakeholders, by inspiring healthcare organizations to excel in providing safe and effective care of the highest quality and value. "Documentation of Care, Treatment, or Services in Behavioral Health Care" is a book published by The Joint Commission to help organizations maintain compliance and effectively use documentation to drive positive outcomes for individuals served. Per The Joint Commission, documentation affects nearly every aspect of care, treatment, or services and outlines the importance of accurate, timely, and appropriate documentation in behavioral health care.

Coding Implications

This clinical policy references Current Procedural Terminology (CPT®). CPT® is a registered trademark of the American Medical Association. All CPT codes and descriptions are copyrighted 2024, American Medical Association. All rights reserved. CPT codes and CPT descriptions are from the current manuals and those included herein are not intended to be all-inclusive and are included for informational purposes only. Codes referenced in this clinical policy are for informational purposes only and may not support medical necessity. Inclusion or exclusion of any codes does not guarantee coverage. Providers should reference the most up-to-date sources of professional coding guidance prior to the submission of claims for reimbursement of covered services.

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CPT® Codes	Description
N/A	

HCPCS Codes	Description
N/A	

Reviews, Revisions, and Approvals	Revision Date	Approval Date	Effective Date
Rebranded policy from corporate policy	6/23	9/13/23	10/13/23
Annual Review. No changes to criteria. Background updated. References reviewed and updated	8/24	11/21/24	12/21/24
Annual review. Description and background updated with no impact to criteria. Criteria statements reorganized for clarity. Updated policy statement I. to reflect “all” behavioral health treatment records...and all of the following elements, “as applicable.” Reworded criteria in I.D. and I.E., for clarity. Added criteria I.H. “Each service encounter...” and I.I. “Results of required screenings...” Moved previous criteria I.M. “Plan for ongoing treatment...” under Treatment plan in I.K.1. Added Discharge summary criteria in I.P.1-4. References reviewed and updated.	07/25	11/17/25	12/18/25

References

- Centers for Medicare and Medicaid Services (CMS). Medicaid Documentation for Behavioral Health Practitioners Fact Sheet. <https://www.cms.gov/medicare-medicare-coordination/fraud-prevention/medicaid-integrity-education/downloads/docmatters-behavioralhealth-factsheet.pdf>. Published December 2015. Accessed March 4, 2025.
- The Joint Commission. Documentation of Care, Treatment, pr Services in Behavioral Health Care. <https://store.jcrinc.com/assets/1/14/ebbh18samplepages.pdf>.
- Noridian Medicare. Jurisdiction E. Medicare Part B. Mental Health Documentation Requirements. <https://med.noridianmedicare.com/web/jeb/topics/documentation-requirements/mental-health>. Updated August 23, 2024. Accessed March 4, 2025.
- Mental Health First Aid National Council for Behavioral Health. Position Statement on Generally Accepted Standards of Care for Behavioral Health. <https://www.thenationalcouncil.org/resources/position-statement-on-generally-accepted-standards-of-care-for-behavioral-health/>. Published August 19, 2019. Accessed March 4, 2025.

Important Reminder

This clinical policy has been developed by appropriately experienced and licensed health care professionals based on a review and consideration of currently available generally accepted standards of medical practice; peer-reviewed medical literature; government agency/program approval status; evidence-based guidelines and positions of leading national health professional organizations; views of physicians practicing in relevant clinical areas affected by this clinical policy; and other available clinical information. LHCC makes no representations and accepts no liability with respect to the content of any external information used or relied upon in developing this clinical policy. This clinical policy is consistent with standards of medical practice current at the time that this clinical policy was approved.

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The purpose of this clinical policy is to guide documentation, which is a component of the guidelines used to assist in making coverage decisions and administering benefits. It does not constitute a contract or guarantee regarding payment or results. Coverage decisions and the administration of benefits are subject to all terms, conditions, exclusions and limitations of the coverage documents (e.g., evidence of coverage, certificate of coverage, policy, contract of insurance, etc.), as well as to state and federal requirements and applicable LHCC administrative policies and procedures.

This clinical policy is effective as of the date determined by LHCC. The date of posting may not be the effective date of this clinical policy. This clinical policy may be subject to applicable legal and regulatory requirements relating to provider notification. If there is a discrepancy between the effective date of this clinical policy and any applicable legal or regulatory requirement, the requirements of law and regulation shall govern. LHCC retains the right to change, amend or withdraw this clinical policy, and additional clinical policies may be developed and adopted as needed, at any time.

This clinical policy does not constitute medical advice, medical treatment, or medical care. It is not intended to dictate to providers how to practice medicine. Providers are expected to exercise professional medical judgment in providing the most appropriate care and are solely responsible for the medical advice and treatment of members/enrollees. This clinical policy is not intended to recommend treatment for members/enrollees. Members/enrollees should consult with their treating physician in connection with diagnosis and treatment decisions.

Providers referred to in this clinical policy are independent contractors who exercise independent judgment and over whom LHCC has no control or right of control. Providers are not agents or employees of LHCC.

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