PCP UPDATE FOR MEMBERS:

We reached out to DMH/DD/SAS officials for clarification regarding whether to retain *achieved* goals in Person Centered Plans moving forward using the new template that will soft launch in June and hard launch in October.  Saarah Waleed, Community Mental Health Section Chief, replied:   “Provider agencies should retain goals in the Medicaid-beneficiary person centered plans in accordance with record retention policy and best practice.  We apologize for any confusion and greatly appreciate your attention to detail as we support person centered planning efforts.”  Please see below for the entire communication sent to DMH/DD/SAS and the Medicaid-enrolled provider contract requirement for records retention.

The impetus for this inquiry was **JCB #445** re:  Person Centered Planning Updates:  new template, trainings, and soft launch and hard launch dates:  [download (ncdhhs.gov)](https://protect-us.mimecast.com/s/yOGdCrk518u8xlVNCzjmAQ?domain=ncdhhs.gov).  NCPC providers emailed Brittany Jones, the primary contact for the bulletin, and I also spoke with Brittany on 4/6.  In both instances, Ms. Jones advised that the new template is a “living document,” and that providers should *remove [PCP] goals [from the record] as they are achieved*.  Ms. Jones’ written response to a provider was, “**Provider Q:** The new format of the plan does not have any place for reviews and updates. Are these no longer required for the plan? **DMH Response**: The guidance for concurrent auths just states that a SAR is required and a PCP.  The PCP is a living document and should be updated as the person’s goals change/ they achieve goals, etc. With that being said as the person’s goals change one would complete the PCP to reflect the new goals and remove the goals they achieve/ are no longer applicable.  This is why there isn’t a space in the new template to indicate a review or updates.”  The guidance from Ms. Jones is concerning, so I have revisited the [NC DHHS Provider Administrative Participation Agreement](https://protect-us.mimecast.com/s/sx_HCv251lc7vzNBCzuiCA?domain=nctracks.nc.gov) and the [2016 RMDM](https://protect-us.mimecast.com/s/YAUQCwp51VuGo38OfKaP4u?domain=ncdhhs.gov), which is the most current version available.  The several links to records retention policies (please see page 1-5 in particular) within the 2016 RMDM *are not working*, so I could not review those more specific policies.  I’m therefore pasting below the DHHS Medicaid-enrolled provider contract requirements for records retention.

Please advise whether provider agencies should:

a) “remove” / delete achieved goals from Medicaid beneficiary Person-Centered Plans; or

b) retain achieved goals in Medicaid beneficiary Person-Centered Plans (e.g., for the purpose of complying with DHHS records retention requirements and to ensure that information is accessible for any future audits, lawsuits, member transfer to another LME/MCO, etc.)

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