POLICY & PROCEDURE (P&P) APPROVAL REQUEST FORM

I. P&P INFORMATION

Assigned Policy Name: **SUTS Executive Level Salary Limitation Policy**
Assigned Policy Number: **BHSD 3501**

Policy Area(s): Mark All That Apply
- [ ] Plan Administration and Organization
- [ ] Scope of Services
- [X] Financial Reporting Requirements
- [ ] Management Information Systems
- [ ] Quality Improvement System
- [ ] Utilization Management Program
- [ ] Access and Availability of Services
- [ ] Provider Network
- [ ] Documentation Requirements
- [ ] Coordination and Continuity of Care
- [ ] Beneficiary Rights
- [ ] Beneficiary Problem Resolution
- [ ] Program Integrity
- [ ] Reporting Requirements

Submitted by: **victor Ibabao**  Date: **9/23/2019**
Policy developed by: **Leilani Villanueva and the BHSD SUTS Team**

Attach P&P Document For Review In this Section [Include Paperclip Icon Here]

II. APPROVAL

Section A: HHS Compliance and County Counsel

HHS Compliance: [Signatures]
Date: **9/24/2019**
County Counsel: [Signatures]
Date: **9/24/2019**

Section B: BHSD Executive Director

BHSD Executive Director: [Signatures]
Date: **9/25/2019**

Note - A copy of the Approved P&P Form will be emailed to: BHSD Compliance Unit
Policy & Procedure Number: BHSD # 3501

Title: Executive Salary Schedule Limitation

<table>
<thead>
<tr>
<th>Approved/Issue Date:</th>
<th>Behavioral Health Services Director:</th>
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<tr>
<th>Last Review/Revision Date:</th>
<th>Next Review Date:</th>
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REFERENCE:

Inter-Government Agreement for Substance Use Disorder Services for Fiscal Year (FY) 2016-17 through FY 2018-19 with DHCS, Contract # 16-93236
   Exhibit A, Attachment I, Section 27.A. - Restrictions on Salaries

Department Health Care Services (DHCS) Standard Agreement for Substance Use Disorder Prevention and Treatment Block Grant Services (SABG) for June 1, 2017 through June 30, 2020, Contract #17-94160
   Exhibit A, Attachment I A1, Section 2.A. – Restrictions on Salaries
   Exhibit B, Section I.6. – Budget Detail and Payment Provisions
   Exhibit B, Part II, Section 2, Subsection I.6.

United States Office of Personnel Management – Senior Executive Service Compensation. 

SABG Policy Manual, What Services cannot be provided with SABG Funding, SABG Policy Manual V.1, p. H-6:

POLICY: Background

To be in compliance with the United States Office of Personnel Management (OPM) and DHCS requirements for executive salary schedule limitations.

Departmental Policy:
It is the Behavioral Health Services Department (BHSD) policy to ensure that no part of any federal funds shall be used to pay for the salary and wages of an individual at a rate in excess of Level I of the OPM’s Executive Schedule. Salary and wage schedules may be found at: https://grants.nih.gov/grants/policy/salcap_summary.htm
SABG funds used to pay a salary in excess of the rate of basic pay for Level I of the OPM’s Executive Schedule shall be subject to disallowance. The amount disallowed shall be determined by subtracting the individual's actual salary from the Level I rate of basic pay and multiplying the result by the percentage of the individual's salary that was paid with SABG funds.

BHSD will not use SABG funds to pay the salary of an individual through a grant or other extramural mechanism at a rate in excess of Level I of the OPM’s Executive Salary Schedule for the awarded year.

BHSD will comply with the County applicable Salary Ordinances.

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<th>Responsible Party</th>
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<tr>
<td>BHSD staff</td>
<td>The County salary schedule will be monitored. In the event that an executive’s salary exceeds Level I of the OPM’s Executive Schedule, steps will be taken to cover the excess with non-federal funds.</td>
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