



POLICY & PROCEDURE (P&P) APPROVAL REQUEST FORM

I. P&P INFORMATION

Assigned Policy Name: Substance Abuse and Prevention Block Grant (SABG) Expenditures Tracking

Assigned Policy Number: BHSD 3601

Policy Area(s): Mark All That Apply

- | | |
|--|--|
| <input type="checkbox"/> Plan Administration and Organization | <input type="checkbox"/> Provider Network |
| <input type="checkbox"/> Scope of Services | <input type="checkbox"/> Documentation Requirements |
| <input checked="" type="checkbox"/> Financial Reporting Requirements | <input type="checkbox"/> Coordination and Continuity of Care |
| <input type="checkbox"/> Management Information Systems | <input type="checkbox"/> Beneficiary Rights |
| <input type="checkbox"/> Quality Improvement System | <input type="checkbox"/> Beneficiary Problem Resolution |
| <input type="checkbox"/> Utilization Management Program | <input type="checkbox"/> Program Integrity |
| <input type="checkbox"/> Access and Availability of Services | <input type="checkbox"/> Reporting Requirements |

Submitted by: victor Ibabao Date: 9/24/2019

Policy developed by: Leilani villanueva and 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: DocuSigned by: Victoria Phan Date: 9/24/2019

County Counsel: 3527B4B4F12742C... DocuSigned by: Emily Fedman Date: 9/24/2019

Section B: BHSD Executive Director

BHSD Executive Director: DocuSigned by: Dani Tullys Date: 9/25/2019

Note - A copy of the Approved P&P Form will be emailed to: BHSD Compliance Unit



Policy & Procedure Number: BHSD # 3601

<input checked="" type="checkbox"/>	BHSD County Staff
<input type="checkbox"/>	Contract Providers
<input type="checkbox"/>	Specialty Mental Health
<input checked="" type="checkbox"/>	Specialty Substance Use Treatment Services

Title: Substance Abuse and Prevention Block Grant (SABG) Expenditures Tracking and Monitoring

Approved/Issue Date:	Behavioral Health Services Director:	
Last Review/Revision Date:	Next Review Date:	Inactive Date:

REFERENCE:

45 Code of Federal Regulations (C.F.R.) § 96.135 - Restrictions on Expenditure of Grant

45 C.F.R. § 96.137 - Payment Schedule

California Health and Safety Code §§ 11999.3, 11999.2

Federal Office of Management and Budget Circular A-133: Audits of States, Local Governments, and Non-Profit Organizations

Department of Health Care Services (DHCS) Standard Agreement, Substance Use Disorder Prevention and Treatment Block Grant Services (SABG), Contract # 17-94160, Exhibit A, Attachment I A1, Part I, Documents Incorporated by Reference: Document 3TA: SAPT Authorized and Restricted Expenditures Information (April 2017)

POLICY:

Purpose

To be in compliance with the SABG fiscal requirements.

Departmental Policy:

It is the Behavioral Health Services Department (BHSD) policy to ensure:

1. Tracking of obligations and expenditures, including but not limited to those spent on primary prevention, and services to pregnant women and women with dependent children.



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<p>2. Compliance with SABG restrictions on expenditure guidelines.</p> <p>SABG expenditures will not be used:</p> <ul style="list-style-type: none"> a. To provide inpatient hospital services <ul style="list-style-type: none"> except that funds may be used for inpatient hospital-based programs if it has been determined by a physician: <ul style="list-style-type: none"> i. The primary diagnosis of the individual is substance abuse, and the physician verifies this fact. ii. The individual cannot be safely treated in a community-based, nonhospital, residential treatment program. iii. The service can reasonably be expected to improve an individual's condition or level of functioning. iv. The hospital-based substance abuse program follows national standards of substance abuse professional practice. <p style="margin-left: 40px;">If this exception applies</p> <ul style="list-style-type: none"> i. The daily rate of payment provided to the hospital for providing the services to the individual will not exceed the comparable daily rate provided for community-based, nonhospital, residential programs of treatment for substance abuse; and ii. The grant may be expended for such services only to the extent that it is medically necessary, i.e., only for those days that the patient cannot be safely treated in a residential, community-based program. <ul style="list-style-type: none"> b. under conditions outlined in paragraph (c) of section 45 C.F.R. § 96.135(c). c. To make cash payments to intended recipients of health services. d. To purchase or improve land. e. To purchase, construct, or permanently improve any building or other facility. f. To purchase major medical equipment. g. To satisfy any requirement for the expenditure of non-Federal funds as a condition for the receipt of Federal funds. h. To provide financial assistance to any entity other than a public or nonprofit private entity. i. For the purpose of providing treatment services in state penal or correctional institutions. j. To supplant state funding of programs to prevent and treat substance abuse related activities.



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3. The Block Grant must be the funding of last resort regarding early intervention services for HIV disease, treatment for pregnant women or women with dependent children, and tuberculosis treatment.

 Programs will have an established system to determine eligibility billing, and collection, to:
 - a. Collect reimbursement for the costs of providing such services to persons who are entitled to insurance benefits under the Social Security Act, including programs under title XVIII and title XIX, state compensation programs, other public assistance program for medical expenses, grant programs, private health insurance, or any other benefit program; and
 - b. Secure payments from clients for services in accordance with their ability to pay.

4. Block Grant fund shall give preferences as follows:
 - a. Pregnant injecting drug users
 - b. Pregnant substance abusers
 - c. Injecting drug users
 - d. All others

5. Programs will include a component that clearly explains in written materials that there shall be no unlawful use of drugs or alcohol. No aspect of a drug- or alcohol-related program shall include any message on the responsible use, if the use is unlawful, of drugs or alcohol.
 This requirement does not apply to programs that provide education and prevention outreach to intravenous drug users with AIDS or AIDS-related conditions, or persons at risk of HIV-infection through intravenous drug use.

6. Compliance with the uniform audit requirements and monitoring activities established in OMB Circular A-133 for SABG.

 SUTS reviews both internal and subcontracted provider invoices quarterly to ensure:
 - a. Expenditures are in accordance with the approved budget.
 - b. Amounts calculate and total correctly.
 - c. There is sufficient detail to permit identification of the cost items.
 - d. Clarification is provided for unusual, miscellaneous or other charges.
 - e. Expenditures are in compliance with applicable laws, regulations, and requirements.



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<p>f. That a statement certifying the trust and accuracy of the charges is attached and signed by the authorized representative.</p> <p>SUTS reviews internal and external annual budget reports to ensure:</p> <ul style="list-style-type: none"> g. Expenditures are in accordance with the approved budget. h. Amounts calculate and total correctly. i. Expenditures are in compliance with applicable laws, regulations, and requirements. <p>No SABG funds will be used to carry out any programs distributing sterile needles for the hypodermic injection of any illegal drugs unless the Surgeon General of the Public Health Service determines that a demonstration needle exchange program would be effective in reducing drug abuse and the risk that the public will become infected with the etiologic agent for AIDS.</p>
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Responsible Party	Action Required
BHSD Personnel and Finance Personnel	BHSD personnel will be knowledgeable of requirements for SABG funding for the respective programs. BHSD personnel and Finance personnel will monitor budgets and expenditures to ensure compliance with regulations.