

BHCS NETWORK OFFICE FALL PROVIDER MEETING

NOVEMBER 6 & 7, 2013

OVERVIEW

Welcome/Opening Remarks

County Contracting Policy and Practice Update

BHCS-Specific Contracting Policy Update

Network Office: Nuts & Bolts

- Contract Modification Procedures
- Reminders
 - Contract finalization
 - Invoicing
 - HIPAA
 - Site Certification

Networking

WELCOME/OPENING REMARKS

Purpose of today's presentations

- Provide updates on changes in contracting policy and process

Network Office role in BHCS

CHANGES TO COUNTY CONTRACTING

Board of Supervisors is requesting that all contracts be fully negotiated prior to Board approval

This represents a substantial change in the timeline to process contract renewals and contract augmentations

Impact to contracting process is significant

BHCS CONTRACTING POLICY

Historically, BHCS managed a high degree of flexibility over contractor budgets and deliverables

BHCS is going through a transition period in leadership, proliferation of funding streams and growth in funding levels

BHCS needs to pass requirements for greater accountability from the County, State and Federal governments on to providers

BHCS Leadership has reviewed the Department's capacity to respond to provider requests for flexibility within their contract allocations

With a contracting budget over \$250m with 180 organizational providers and with the changing accountability requirements for BHCS, the capacity to respond to multiple provider requests for contract changes is limited

BHCS CONTRACTING POLICY

Changes to contract language in the last year represent a substantial change for BHCS and potentially impact contractors' capacity to respond to changing service needs in the community

BHCS remains committed to being responsive to client needs in the community and sees the contractor community as important partners in that effort

Sometimes service needs can be accommodated within an organizational contract; however, at times, shifts in resources between providers need to be made to accommodate client needs

BHCS CONTRACTING POLICY

BHCS wishes to allow substantive contract changes twice per year:

- December 1: for all modifications to funding streams or program budgets that will impact this year or next year's contract maximum
- February 1: all other changes that impact the deliverables – including modifications to the units of service, clients served, rate agreement.
- Some flexibility to move funds across programs remains and BHCS is still taking provider input on this issue
- The Exhibit B contract language does accommodate responses to unforeseen circumstances that impact services to clients

NETWORK OFFICE ROLE

Network Office role is to implement policies set by BHCS Leadership

Network Office staff work closely with Operational Managers and BHCS Leadership to execute contract changes

Network Office staff provide a liaison role to contracted providers

Network Office staff may make recommendations and provide analysis regarding contractor requests to Operational Managers and BHCS Leadership

All substantive contract decisions are made by BHCS Leadership and executed by the Network Office in partnership with Operational Managers and contractors

NETWORK OFFICE: NUTS & BOLTS

Contract Modifications and Budget Revisions

Reminders Announcements

- Contract Finalization
- Invoicing
- HIPAA
- Site Certification

CONTRACT MODIFICATIONS

– IMPORTANT DATES

Deadline for contract modification requests subject to Section II.B.a.i-vii of Exhibit B

- **December 1**

Impact to total contract maximum in current or subsequent contract

Deadline for contract modifications that do NOT impact the contract maximum

- **February 1**

Requests to move funds between programs

Retroactive approval

- Natural Disaster, terrorist attack, act of war
- Emergency purchases to avoid interruption of services etc.

CONTRACT MODIFICATION PROCEDURES

- Contractor requests requiring BHCS approval need to include:
 - Name of impacted program(s)
 - Proposed amounts
 - Whether proposed funding movement is this fiscal year only or ongoing;
 - Justification and implementation plan for the changes in impacted programs/RUs
- Provider's responsibility to seek clarity if prior approval is required
- Impact of failure to submit request by deadline
 - May not be approved
 - May not be executed
 - May affect future contract allocations

CONTRACT CHANGES – NO WRITTEN APPROVAL REQUIRED

- No program impact of more than 10 percent of program allocation
- No program expansion of more than 25 percent of program allocation
- Total funds being moved amount to less than 20 percent of total contract
- No impact to County match (if unsure, check with Fiscal Contract Manager)
- Same age-based system of care
- Same service modality
- Same SELPA*
- No change in RFP allocation
- Same funding stream
- Same reimbursement method

Reference: *Exhibit B Section II.B.2*

*Special Education Local Program Area

EXHIBIT B - WRITTEN APPROVAL REQUIRED

Revisions to Personnel & Operating Expenses (*Ex B: Section II.B.1*)

- Written approval from BHCS for revision of 10 percent or more in budget categories within a program (budget column)

Between Programs and Reporting Units (RUs) (*Ex B: Section II.2.a*)

- Impacts County match
- Moves funding between age-based systems of care
- Changes service modality
- Same SELPA*
- Modifies RFP allocation
- Impacts categorical allocation
- Impacts programs with different reimbursement methods (e.g. provisional to negotiated)

*Special Education Local Program Area

EXHIBIT B - WRITTEN APPROVAL REQUIRED (CONT'D)

Between Programs and RUs *(Section II.B.2.c)*

- Greater than 10% from any program/RU
- Greater than 25% to any program/RU
- Cumulative transfer greater than 20% impacting multiple programs/RUs

NUTS & BOLTS: REMINDERS

Contract Finalization

- Authorized signatures need to be on file
- Signing in a timely manner is helpful, and often critical to beginning or continuing service

NUTS & BOLTS: REMINDERS

Invoicing

- Monthly Invoices:
 - BHCS Provider's Claim Form
 - No later than thirty-five (35) calendar days after the last day of the service month
 - Original invoice with appropriate attachments
- Invoices After End of Contract Terms:
 - Within forty-five (45) calendar days following the end of the term of this Contract
 - All invoices submitted after forty-five (45) calendar days subject to BHCS approval
- Cash Advance:
 - One-time cash advance
 - Case-by-case basis in response to critical financial need
 - Entity must be community-based, private and nonprofit
 - Cash Advance Maximum: 1/12th of total contract allocation
 - Repayment method is subject to BHCS approval

NUTS & BOLTS: HIPAA

HIPAA

- New Exhibit E
- Included in all contract packages from October forward
- Contracts executed early in the fiscal year will receive the new Exhibit as an amendment

NUTS & BOLTS: SITE CERTIFICATION

Site Certification for Mental Health Programs which bill to Medi-Cal

- Plan ahead for fire clearance – It must be maintained
- All sites must be re-certified every three years
- Importance of planning for site certification visits – Pay particular attention to P&Ps

**THANK YOU AND IT'S TIME FOR
NETWORKING**