



## MENTAL HEALTH MEDI-CAL SITE CERTIFICATION FREQUENTLY ASKED QUESTIONS (FAQ)

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**What is a mental health Medi-Cal site certification?**

A Medi-Cal site certification is a review of a program that provides mental health services billable to Medi-Cal, to evaluate compliance with local, County, State or Federal regulations<sup>1</sup>.

**Why are mental health Medi-Cal site certifications required?**

Alameda County Behavioral Health Care Services (BHCS) requires all contracted and County-operated program sites that bill to Medi-Cal to be certified in accordance with [California Code of Regulations \(CCR\) Title 9, CCR Section 1810.435](#) and the requirements specified in Appendix D of the BHCS contract with California Department of Health Care Services (DHCS).<sup>2</sup>

All contracted and County-operated program sites must be certified in accordance with the program site Medi-Cal certification [protocol](#). Program sites must meet the minimum requirements as set forth in CCR, Title 9 and the DHCS contract, Exhibit A, Attachment 1, Section k and Exhibit E.

**Who is responsible for conducting mental health Medi-Cal site certifications?**

The County or the State are responsible for conducting certifications. Table 1 illustrates whether the County or State performs certifications, which is dependent on the service modality and provider type.

BHCS' Network office is responsible for liaising with DHCS<sup>3</sup> to request initial Medi-Cal program site certifications for County-operated outpatient program sites. County-operated is defined as any program that shares BHCS' legal entity number.

**Table 1**

| Service Modality   | Provider Type & Certifier                    |   |  |
|--|--|---|--|
|  | Contractor initial and re-certifications     | County-operated initial                                   | County-operated re-certifications            |
| Day Services: <ul style="list-style-type: none"> <li>• Day Treatment Intensive ½ Day</li> <li>• Day Treatment Intensive Full Day</li> <li>• Day Treatment Rehabilitation ½ Day</li> <li>• Day Treatment Rehabilitation Full Day</li> </ul> Outpatient services: <ul style="list-style-type: none"> <li>• Case Management/Brokerage</li> <li>• Mental Health Services</li> <li>• Therapeutic Behavioral Services (TBS)</li> <li>• Medication Support</li> <li>• Crisis Intervention</li> <li>• CSU Emergency Rooms</li> </ul> CSU Urgent Care | BHCS' Network Office                         | DHCS Program Oversight and Compliance Branch <sup>4</sup> | BHCS' Network Office                         |
| 24-Hour Services: <ul style="list-style-type: none"> <li>• Inpatient Hospital</li> <li>• Psychiatric Health Facility</li> <li>• Skilled Nursing Facility</li> <li>• Institute for Mental Disease</li> </ul>  | DHCS Program Oversight and Compliance Branch | DHCS Program Oversight and Compliance Branch              | DHCS Program Oversight and Compliance Branch |

<sup>1</sup> California Code of Regulations (CCR) Title 9

<sup>2</sup> Exceptions and additions to this policy are psychiatric inpatient and outpatient hospital-based sites. Hospital sites are licensed by the State Department of Health Services, Licensing and Certification Division.

<sup>3</sup> For more information on County-operated program sites, please see [DMH Letter 10-04](#).

<sup>4</sup> <http://www.dhcs.ca.gov/services/MH/Pages/POCB-MentalHealth-Overview.aspx>

| Service Modality  | Provider Type & Certifier                |                         |                                   |
|---|--|-------------------------|-----------------------------------|
|   | Contractor initial and re-certifications | County-operated initial | County-operated re-certifications |
| <ul style="list-style-type: none"> <li>• Adult Crisis Residential</li> <li>• Jail Inpatient</li> <li>• Residential Other</li> <li>• Adult Residential</li> <li>• Independent Living</li> </ul> Mental Health Rehabilitation Centers |  |                         |                                   |

**How often are certifications required?**

Medi-Cal re-certifications are conducted every three years. If a contracted or County-operated program moves to a new location, a new certification is required.

**What other types of certifications/site visits exist?**

Behavioral Health Care Services (BHCS) is a large department, which contains many units that may visit contracted and County-operated program sites. The following matrix provides a list of common types of site visits, which program sites they pertain to, the purpose of such visits and who in BHCS conducts the visits.

Table 2 is meant to provide an overview and is not meant to be comprehensive.

**Table 2**

| Type  | Pertaining to...  | To evaluate...   | BHCS unit   |
|---|---|--|---|
| Mental Health Medi-Cal Program Site Certifications                | Contracted and County-operated mental health programs funded with mental health Medi-Cal  | Compliance with State regulations <sup>5</sup> within a program site   | Network Office Program Contract Managers (PCM) or other BHCS <sup>6 7</sup> |
| Alcohol and Other Drug (AOD) Medi-Cal Program Site Certifications | Contracted and County-operated AOD programs funded with AOD Medi-Cal                      | Compliance with State regulations <sup>8</sup> within a program site   | State conducts all site visits, <b>not BHCS</b>                             |
| Bay Area Service Network (BASN)/AB 109 Site Visit                 | Contracted AOD providers funded with BASN   | Compliance with State regulations <sup>9</sup>   | Network Office PCMs   |
| Substance Abuse Prevention and Treatment (SAPT) Site Visit        | Contracted providers funded with SAPT   | Compliance with federal Substance Abuse and Mental Health Services Administration (SAMHSA) SAPT funding requirements | Network Office PCMs   |
| School-Based Services Site Visit                                  | Contracted mental health providers funded with Medi-Cal EPSDT                             | Compliance with funding requirements   | Network Office PCMs or other BHCS designees                                 |
| General Site Visit  | Contracted mental health and AOD providers funded with any type of Alameda County dollars | To evaluate compliance with funding requirements and quality of service  | Network Office PCMs or other BHCS designees                                 |

<sup>5</sup> California Code of Regulations (CCR) Title 9

<sup>6</sup> For County-operated programs, the Department of Health Care Services (DHCS) conducts initial certifications.

<sup>7</sup> The DHCS Program Oversight and Compliance Branch perform some certifications.

<sup>8</sup> California Code of Regulations (CCR), Title 9

<sup>9</sup> Interagency Agreement with the Department of Alcohol and Drug Programs and CDCR/OS; DOM Chapter 10, Article 2

| Type                                      | Pertaining to...  | To evaluate...  | BHCS unit  |
|---|---|---|--|
| Clinical Care and Client Flow Site Visits | Contracted mental health and AOD providers funded with any type of Alameda County dollars | To evaluate compliance with service regulations and standards                               | Management Support Services' Senior and Clinical Program Specialists |
| Quality Assurance (QA) Site Visits        | Contracted mental health and AOD providers funded with any type of Alameda County dollars | To evaluate and investigate compliance with service regulations and standards <sup>10</sup> | Quality Assurance staff  |

## FIRE CLEARANCES

### **When is new fire clearance required?**

Contracted and County-operated program sites should have a current valid fire clearance on file at all times. A new fire clearance may be required if the site undergoes a major renovation or other structural changes. Sites that are unsure if they need a new fire clearance due to renovation should consult with their local fire agency.

Contracted and County-operated program sites should schedule an annual fire safety inspection with the local fire department to receive a fire clearance, in writing, for each program site. The fire clearance should have the date it was approved and the site address clearly marked.

### **What is a valid fire clearance?**

For the purposes of this policy, current is defined to mean within the last twelve months<sup>11</sup>. If a program site does not have a current fire clearance, the certification will not be scheduled or completed, which may make the contracted provider liable for rejections of claims billed to Medi-Cal during the lapse in certification.

Note that proof of sprinkler testing is not a substitution for a fire safety inspection and current and valid fire clearance.

The only exception to a fire clearance issued by a local fire department is if the provider has written proof that the local fire department approved the outside company used and specifies the type of inspection that meets their minimum standards.

New program sites may not begin deliver services without a current and valid fire clearance from the local fire department. Providers that knowingly bill new services to an existing reporting unit (RU) instead of the new program site location are in violation of State regulations.

### **How is a fire clearance obtained?**

When the program site receives the fire clearance expiration notice from the Network Office, BHCS recommends that the provider immediately contact the fire department to schedule the fire safety inspection. BHCS recommends that provides assign this role and responsibility within their organization and placing important dates and reminders in calendars as well.

Note that a new fire safety inspection and fire clearance may be required if the site undergoes a major renovation or other structural changes. Program sites that are unsure if they need a new fire safety inspection due to renovation should consult with their local fire department.

## SATELLITE SITES AND PROVIDING SERVICES IN LEASED AND SCHOOLS SPACES

### **What is a satellite site?**

DHCS defines a satellite site as a site that is owned, leased or operated by an organizational provider at which specialty mental health services are delivered to beneficiaries less than 20 hours per week, or, if located at a

<sup>10</sup> <http://www.acbhcs.org/providers/QA/QA.htm>

<sup>11</sup> The State of California standard for the fire clearance is one year.

multiagency site, at which specialty mental health services are delivered by no more than two employees or contractors of the provider.<sup>12</sup>

**When is it okay to have satellite sites?**

BHCS will create new satellite sites on an as-needed basis, as determined by the Provider Network Manager in consultation with Operations, as needed. Efforts are being made in BHCS to remove this distinction in most situations, due to the difficulty tracking when satellite sites provide twenty or more hours of service.

**When a contracted provider or County-staff are providing school-based services and registering for an National Provider Identifier (NPI) number, which EIN should be used?**

The contracted provider or County-operator must use their own EIN.

Contracted and County-operated programs that bill to Medi-Cal must immediately notify the Network Office if their program sites have not been certified, even if the program site believes they are a designated “satellite site”.

**When a contracted or County-operated program is providing services in a school or leased site, who is responsible for obtaining the fire clearance?**

As a condition of providing services in a school, schools must obtain a fire safety inspection and subsequent fire clearance annually, at their cost. BHCS expects schools to provide a copy of the fire clearance to the contracted or County-operated provider.

BHCS recommends that contracted and County staff in schools learn who is responsible for this task within the school to ensure that they receive a copy of the annual fire clearance.

For providers in leased space, contracted and County-operated programs must contract the property manager/owner for a copy of the annual fire clearance. BHCS recommends that providers discuss this expectation of an annual fire safety inspection with the property manager/owner upon signing a lease.

Contracted staff may choose to obtain a fire clearance for the room/suite in which they occupy at their own cost.

For County-owned locations, staff should contact General Services Agency (GSA) to obtain a copy of the fire clearance.

**MEDI-CAL RE/CERTIFICATIONS AND REQUIRED MEDI-CAL POLICIES AND PROCEDURES**

**How is a certification requested?**

Contracted providers and County-operated sites must request initial certification using this form: [Program Change Request Form](#), which is subject to the appropriate System of Care Director approval.

- Contracted providers submit this form to their designated Program and Fiscal Contract Managers.
- County-operated sites submit this form to the System of Care Director. The completed form should then be submitted to the Network Office (Provider Network Manager).

This form may also be initiated by Network Office Contract Mangers in some cases, (the program has been awarded as part of a Request for Proposal (RFP)) and approved/signed by the appropriate System of Care (Director. Once received, the Provider Network team will contact the Contractor to obtain a current and valid fire clearance and subsequently schedule a program site Medi-Cal certification visit.

Since there are no contract and no Program or Fiscal Contract Managers for County-operated program sites, the county-operated Program Director or designee should check the protocol to ensure that it was pre-filled correctly (that all provided modalities are appropriately checked).

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<sup>12</sup> Contract Number M\_200607, Exhibit E

### **How is a certification for 24-hour service requested?**

Requests for certification of the following services must be submitted to BHCS' Network Office and not directly to the State:

- Adult and Crisis Residential Treatment facilities and
- Non-Hospital Psychiatric Health Facilities.

### **How should Contractors and County-operated programs prepare for certification?**

BHCS has created a tool to help providers successfully prepare for the re/certification. Contractors and County-operated programs should use the [Completing the Protocol](#) tool.

## **INCOMPLETE CERTIFICATIONS AND/OR EXPIRED CERTIFICATIONS**

### **What is an expired certification?**

An expired certification is defined as provider failure to certify or re-certify a program site as a result of contracted provider non-compliance, as defined by BHCS.

### **What happens if a certification expires?**

Expiration may result in a Plan of Correction, as evaluated by the Network Office, Quality Assurance and Operations. Failure to submit a satisfactory Plan of Correction, as defined by BHCS, may result in BHCS following the Contractor Non-Compliance Sanction Policy contained in the Exhibit B: Payment Provisions Terms and Conditions of Payment.

### **How does a program site know when a certification is expired?**

BHCS' Network Office tracks certification expiration dates of all known program sites that bill to mental health Medi-Cal. The Network Office sends a courtesy notice (email or mail) to the program site contact person 180 days prior to expiration; 90 days prior to expiration and 60 days prior to expiration.

Once the provider receives this notice, the provider should call the fire department to schedule a fire safety inspection to obtain a current and valid fire clearance. Once the fire clearance is obtained, the provider must submit a copy to BHCS; ensure that the program site has updated its policies and procedures to be in compliance with the program site Medi-Cal certification [protocol](#); and immediately respond to any correspondences and requests for meeting dates from BHCS.

BHCS recommends keeping a copy of the last certification on file so that the dates may be saved and tracked. Each contracted and County-operated program site should designate a staff person to be responsible for this duty and mark their calendars to ensure that they are prepared for Medi-Cal re-certifications.

### **What is an incomplete certification?**

Incomplete certification occur when a certifier conducts a Medi-Cal program site visit, but the contracted or County-operated program site fails to meet the standards set forth in the certification [protocol](#).

### **What happens upon an incomplete certification?**

Depending on the issue, the Network Office will issue a Request for Follow-Up for completion of Medi-Cal Certification or work with Quality Assurance (QA) to request a Plan of Correction. Both the Follow-Up for Completion and Plan of Correction request a correction from the provider, in writing, stating the deficient areas to be addressed and corrected within a specific time frame.

### **What is a Request for Follow Up for Completion?**

A Request for Follow-Up may be issued by the Network Office as a result of an unsuccessful certification due to contracted provider's lack of properly posted brochures and materials, lack of appropriate written policies, procedures and forms, lack of general operating procedures and forms. Contracted providers will be given a specified time to correct the issues and respond.

Upon receipt of contracted provider's response to the Request for Follow-Up, the Network Office will accept or reject the response. If the response is rejected, the provider will be given a specified time to correct the issues and respond.

Please note that for certifications conducted by DHCS, the State will send any items needed for follow up. The County-operated program site contact person is responsible for following up, planning and responding to any such follow up requests.

**What is a Request for Plan of Correction?**

A Plan of Correction may be issued by the Network Office in coordination with BHCS' Quality Assurance (QA) unit due to contracted provider's failure to Follow-Up to certification issues in a satisfactory and/or timely manner, as defined by BHCS. A Plan of Correction may also be issued without a Follow-Up notice for more serious deficiencies, as defined by BHCS.

Please note that for certifications conducted by DHCS, the State will send any subsequent request for a Plan of Correction. The County-operated program site contact person is responsible for following up, planning and responding to any such Plan of Correction.

Upon receipt of contracted provider's response to a Plan of Correction, the Network Office will work with Quality Assurance to review and accept or reject the response. In either case, the Network Office will provide a written response to the contracted provider. Contracted providers will be given a specified time to correct the issues and respond.

**OUT-OF-COUNTY CONTRACTORS**

**How is out-of-County defined?**

Table 3 defines Alameda County's cities and unincorporated areas.

**Table 3**

| <b>Region</b>  | <b>Cities and Unincorporated Areas</b>  |
|----------------|---|
| North County   | Alameda, Albany, Berkeley, Emeryville, Oakland and Piedmont   |
| Central County | Unincorporated areas of Ashland, Castro Valley, Cherryland and Cities of Hayward, San Leandro and San Lorenzo |
| South County   | Fremont, Newark and Union City  |
| East County    | Dublin, Livermore, Pleasanton, Sunol and surrounding unincorporated areas                                     |

Any cities that are not listed in Table 3 are considered out-of-County.

**What are the expectations for out-of-County providers?**

Contracted out-of-County organizational providers are required to obtain and submit a copy of their host County's program site Medi-Cal certification letter and fire clearances with any additional licensing or certification requirements as applicable required by local, County, State or Federal regulations to BHCS' Network Office.

**What should the host-County certification contain?**

The certification must contain the same service modalities contained in the contract with BHCS. Contracted out-of-County providers must submit proof of the program site Medi-Cal certification after each re-certification.

**The host-County's certification does not contain the same service modalities, what happens next?**

The modalities of the host-County certification must match the Alameda County BHCS contract. If the service modalities do not match, Alameda County BHCS may request that the host County conduct an additional program site Medi-Cal certification for Alameda County's use. If the host County does not comply, the Network Office may choose to certify the out-of-County contracted site.

Each contracted and County-operated program site should designate staff to be responsible for this duty and mark their calendars to ensure that they are prepared for Medi-Cal re-certifications.