



# Alameda County Behavioral Health Care Services

## Annual Provider Presentation Spring 2021

Substance Use Disorder, May 26, 2021

## 2021 Spring Provider Meeting Presentation for Substance Use Disorder Programs Table of Contents

**Meeting Date: May 26, 2021**

Agenda Topic		Presenter	Slide #	Timeline (hh:mm:ss)
<b>1</b>	Introduction	Edilyn Velasquez, Interim Contracts Director	1	00:00:02
<b>2</b>	Welcome	Dr. Karen L. Tribble, PsyD, LCSW, ACBH Director	2	00:00:25
<b>3</b>	Agenda Overview	Edilyn Velasquez	3-4	00:03:15
<b>4</b>	ACBH Finance Updates	Cecilia Serrano, Finance Director	5-6	00:06:34
<b>5</b>	Payment Reform Update	Rickie M. Lopez, Assistant Finance Director	7	00:11:42
<b>6</b>	Contracts Unit Updates	Edilyn Velasquez	8-18	00:14:00
<b>7</b>	Procurement Updates	Rachel Garcia, Interim Procurement & MHP FFS Manager	19-22	00:26:33
<b>8</b>	Contract Renewal Reminders <ul style="list-style-type: none"> <li>• Exhibit A Review</li> </ul>	Wendi Vargas, Assistant Contracts Director	23-24 25-33	00:35:15 00:38:25
<b>9</b>	Privacy & Security Requirements	Priya Bala, ACBH Security Officer	34-38	00:56:32
<b>10</b>	Key Security Requirements <ul style="list-style-type: none"> <li>• Privacy Incident Steps</li> <li>• Privacy &amp; Security Contact Information</li> </ul>	Priya Bala, ACBH Security Officer	39-40 41 42	01:05:15 01:13:55 01:17:14
<b>11</b>	Exhibit B-1 Review <ul style="list-style-type: none"> <li>• Invoice Processing</li> <li>• Cash Advance</li> <li>• Additional Reports Requests</li> </ul>	Lani Pallotta, SUD Fiscal Supervisor	43-45 46 47 48	01:18:20 01:26:35 01:27:56 01:28:48
<b>12</b>	Other Resources	Belinda Davis, Administrative Support Manager	49-50	01:29:37
<b>13</b>	Questions and Answers	Belinda Davis, Administrative Support Manager	51	01:32:10
<b>14</b>	Thank you	Edilyn Velasquez		01:49:58



# Alameda County Behavioral Health Care Services

## Annual Provider Presentation Spring 2021

Substance Use Disorder, May 26, 2021

Presented by: ACBH Finance/Contracts Team



# Welcome

Dr. Karyn L. Tribble, PsyD, LCSW

ACBH Director



## Our Current Environment

- Cautious optimism amidst slow and careful re-opening
- Resilience
- Acknowledge good work when we collaborate
- Encourage self-care
  - [Self-Care & Supportive Resources during COVID-19](#)



# Agenda

- Welcome
- ACBH Finance Updates
- Payment Reform Update
- Contracts Unit Updates
- Procurement Updates/Reminder
- Contract Renewal Reminders
- Exhibit A Review
- Privacy & Security Requirements
- Exhibit B Review
- Other Fiscal Reminders
- Other Resources and Questions



# ACBH Finance Division Updates

- **Finance Organizational Restructure**

- Pending transition of functions within Finance

- **ACBH FY 21-22 Maintenance of Effort (MOE) Budget**

- \$570M appropriations with \$514M of offsetting revenue
- \$19M net county increased mainly due to the Santa Rita Jail positions
- \$2.6M of CBO COLAs
- \$9.3M of revenue reduction (\$4.7M in Realignment including the match to Medi-Cal of \$4.6M)



## ACBH Finance Division Updates (cont'd)

- **Values-Based Budgeting (VBB) Reduction Plans**
  - County MOE budget gap is \$49.3M
  - For FY 21-22, CAO recommended mid-year budget adjustments combining budget strategies of decreasing cost or increasing revenue vs budget balancing formula options
  - Pending VBB guidance and instructions from the CAO
- **FY 21-22 Governor's May Revised Budget**
  - ACBH/HCSA is providing CAO an analysis of the proposed budget and the May budget revision including potential funding, program, and service impacts to the Department





# Payment Reform Update

- **Payment Transformation Pilot with Full Service Partnership Programs**
- **Updates for FY 21-22**
  - Four year implementation plan:
    - Blended rate year FY 2021-22
    - Full Fee-for-Service implementation FY 2022-23
    - Planning for SUD Pilot
- **CalAIM – California Advancing and Innovating Medi-Cal**
  - Billing Code Changes
  - Payment Reform
- **Alameda County leading discussions at the State**



## Medi-Cal Administrative Activities (MAA) Incentive Program

- **Memo dated August 17, 2020**

- Share the Savings Incentives
- CBO partners will retain 5-15% of the MAA revenue generated
  - Generate less than 10% of program allocation, receive 5% of revenue generated
  - Generate 10% or more of program allocation, receive 5% of revenue generated
  - Generate 20% of program allocation, receive 5% of revenue generated

- **FY 21-22 Programs with MAA**

- Incentives earned from revenue generated in FY 19-20 will be included in the FY 21-22 program allocation
- No action needed for program already participating in MAA Billing for FY 21-22



# Contracts Unit Projects/ Updates

- **FY 20-21 Contract Finalization**
  - SUD – 100% finalized and executed
  - MH – 100% finalized; 96% executed
  
- **Medi-Cal Final Rule Compliance**
  - OIG Exclusion P&P refinement
  - NACT increased compliance requirements
  - Provider Directory cultural competency training
  
- **Technology Upgrades**
  - Contract Lifecycle Management (CLM) – Year 2 Build phase
  - DocuSign

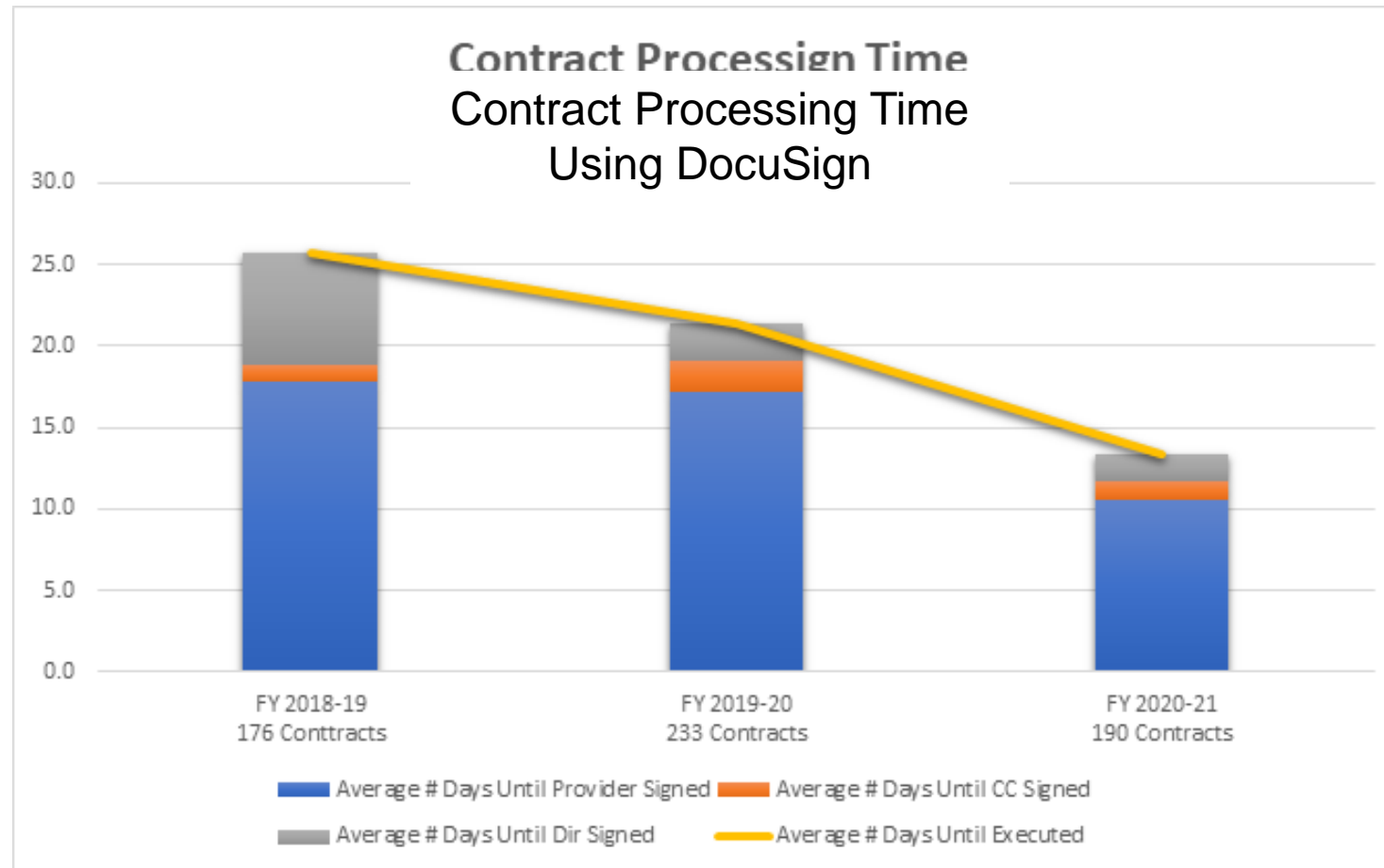


## DocuSign by the numbers

<b>FY</b>	<b>Total # of Contracts DocuSigned</b>	<b>Average # Days Until Provider Signed</b>	<b>Average # Days Until CC Signed</b>	<b>Average # Days Until Dir Signed</b>	<b>Average # Days Until Executed</b>
<b>FY 2018-19</b>	176	17.8	1.0	6.9	25.8
<b>FY 2019-20</b>	233	17.2	1.9	2.3	21.4
<b>FY 2020-21</b>	190	10.6	1.2	1.7	13.4



## DocuSign cont'd...





## Contracts Unit Projects/ Updates (cont'd)

- **Newly Awarded Programs/Services**
  - Primary Prevention for Youth + Friday Night Live
  - PHF and CSU + Outpatient @ Willow Rock Center
  - Expanded contractor pool for Housing Support, Eating Disorder and SNF supportive services
- **Backfilling staff vacancies and new staff onboarding**
  - 23% vacancy in 2020
  - Reduced to 10% as of May 2021

## New Contracts Unit Staff

- **Program Team**



Ju Hong  
Program Contract Manager



Laura Rankin  
Program Contract Manager



Eileen Hamlin  
Program Contract Manager



May Fung  
Program Contract Manager

## New Contracts Unit Staff

- **SUD Team**



Tiana Jordan  
SUD Fiscal Contract Manager

- **Other Team Members**



Karin Vosgueritchian  
Management Analyst



## New Contracts Unit Staff

- **Mental Health Fiscal Team**



Bede Anunne  
Fiscal Supervisor



Jimmy Yi  
Senior Fiscal Contract Manager



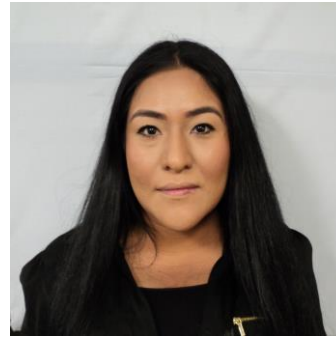
Lena Fletcher  
Senior Fiscal Contract Manager

## New Contracts Unit Staff

- **Mental Health Fiscal Team**



Ronald Reyes  
Fiscal Contract Manager



Maria Araujo Medina  
Fiscal Contract Manager

## New Contracts Unit Staff

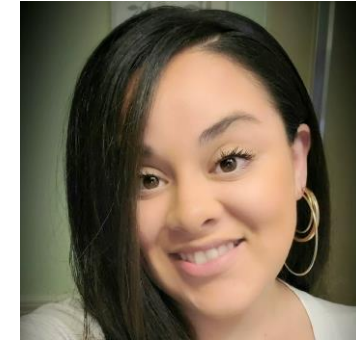
- **Procurement and MHP FFS Provider Network Team**



Rachel Garcia  
Interim Procurement &  
MHP FFS Provider Manager



Ariana Frazier  
Administrative Specialist II



Rosalinda Gomez Gonzalez  
Administrative Assistant



## Upcoming FY 21-22

- **FY 21-22 Contract Renewal Package sent to CBOs**
  - MH – 53% sent to-date; rest will go out by 2<sup>nd</sup> week of June
  - ACBH minimized contract changes
  - Flexibility to use approved FY 20-21 rates to finalize contract
  - Other requested changes need contract negotiation
- **Finance restructuring**
- **Leverage technology to streamline contracting**
- **Staff hiring, onboarding and retention**



# Procurement Updates

Active Procurements	
Procurement	Status
RFPQ #21-01 Eating Disorder Treatment Services	Review and Evaluation Phases



# Procurement Reminders

- **Before responding to RFPs:**
  - Read RFP and instructions
  - Attend Bidder's Conferences to get clarification
  - Submit questions to Procurement Lead no later than 5 pm on 2<sup>nd</sup> Bidder's Conference
- **When responding to RFPs:**
  - Bidders may submit bids electronically
  - Pay attention to **strict bid submission deadlines** (bids received even 1 minute after deadline will not be accepted)
  - Use of MS Word Bid Response Template is optional but all Bidders **must** adhere to the overall page maximum
  - Communicate with the Procurement Lead only to avoid disqualification



## Procurement Reminders (cont'd)

- **When responding to RFPs:**
  - Review Minimum Qualifications
  - Submit a realistic program budget that:
    - Stays within maximum contract allocation
    - Supports proposed program model
    - Matches the budget narrative
    - Does not duplicate administrative costs
  - Provide thoughtful references
  - Some funding does not allow for subcontracting, please carefully review instructions



## Procurement Reminders (cont'd)

- **After RFP award:**
  - Bid becomes the basis of the contract
  - Post award exclusion checks at the employee level
  - Submit requested contract information timely
  - Contract start date after BOS approval; no costs allowed prior to start date
  - New programs will often be in a stand-alone contract
  - County has the right to invite next highest ranked Bidder within 60-day initial contract period, if initial awardee fails to meet County requirements





# Contract Renewal Updates/Reminders

## **What are Key Points from Contract Renewal Cover Letter?**

- Still under Public Health Emergency (PHE)
- Trying to process contracts with minimal changes where possible
- When PHE rescinded: memo on policy changes/next steps

## **Coordination/communication is essential**

- Between Program/Fiscal Staff within your organization and ours
- Goal to communicate/negotiate changes proactively
- Reach out to Contract Managers with questions/concerns



# Contract Renewal Updates/Reminders

## **When will CBOs receive Contract Renewal Packages?**

- Batch 1: Mid-April
- Batch 2: Early May

## **What do I do with my Contract Renewal Package?**

- Review: Contract Renewal Letter, Allocation, Exhibit A Documents
- Complete: Budget, Exhibit A Input Table
- Submit in accordance to Table of Contract Renewal Requirements



## Exhibit A Documents

- **Exhibit A: Table of Contents**
- **Exhibit A-1: Standard Requirements**
  - Across all programs/Medi-Cal programs
- **Exhibit A-2: Lobbying Restrictions**
- **Exhibit A-3: Qualified Service Organization Agreement**
- **Exhibit A-Program Requirements (Exhibit A-P)**
  - Additional requirements across a group of similar programs
  - Not all programs will have a corresponding Exhibit A-P
- **Exhibit A-Scope of Work (Exhibit A-SOW)**
  - Additional requirements for a specific program as it will be delivered for your organization



## Exhibit A Documents

- **For more specific changes to Exhibit A-1 and Exhibit A-Ps:**
  - Please see our website at:  
<http://www.acbhcs.org/providers/network/forms.htm#contract>
- **For more specifics about your Exhibit A and Exhibit A-SOWs:**
  - Please see the custom documents in your contract renewal



## Exhibit A-1 Review

- **Scope of Service (reminders)**

- Comply with all applicable requirements from:

- ACBH Policy Manual

- <http://www.acbhcs.org/providers/PP/Policies.htm>

- ACBH QA Manual

- [http://www.acbhcs.org/providers/QA/qa\\_manual.htm](http://www.acbhcs.org/providers/QA/qa_manual.htm)

- ACBH State County Plans and Grant Agreements

- <http://www.acbhcs.org/providers/network/cbos.htm#resources>



## Exhibit A-1 Review (cont'd)

### Staffing

- Notify ACBH IS of staff changes
- Exclusion checks needed for additional programs
- Credentialing/Certification of License
  - Ensure staff profiles with CAQH-Pro View
  - Printouts from CA BreEZe do not suffice for credentials



## Exhibit A-1 Review (cont'd)

### **Staffing** *(continued)*

- Retention of Staff Records
  - Contractor shall retain employee files for credentials and training for the period of at least ten years from date of service, end of Medi-Cal or Medicare Advantage or Medicare Part D contract period, or audit completion, whichever is later.
  - ACBH recommends a record retention period of at least 15 years from the date of service for programs billing to Medi-Cal and Medicare. Evidence of credentials and training shall be furnished to ACBH upon request.



## Exhibit A-1 Review (cont'd)

### Other

- Smoking should not be a factor in client eligibility or discharge
- CBOs using Electronic Health Records (EHR):
  - Maintain all parts of clinical record not stored in the EHR.
- Participate in QI activities, including PIPs as requested ACBH
  - In relation to state/federal responsibilities.
- Updated threshold languages:
  - English, Spanish, Arabic, Chinese (spoken: Cantonese/ Mandarin; written: Traditional/Simplified), Tagalog, Vietnamese.





## Exhibit A-1 Review (cont'd)

### **Other** *(continued)*

- Submit any updates to provider/program/staff information, as well as attestation of accuracy of information on file
  - By the 15th of each month
  - As requested by ACBH
  - For required publications, submissions and monitoring including Provider Directory and Network Adequacy Reporting.



## Ex A-P Requirements

- **DMC ODS:**
  - P&Ps for Client Admission/Readmission, Drug Testing
- **Outpatient/Residential Treatment:**
  - 60% leave program with satisfactory progress
- **Outpatient Treatment:**
  - 30-day notice: Sharefile for Referrals from Portals
  - 1 hr of CM/client, 1-in-12 clients get RSS
  - New targets for clients receiving IOS (custom)



## Ex A-P Requirements (cont'd)

- **Residential Treatment:**
  - Updated clients based on LOS (54 days for adult, 67 peri/par)
  - Continuing under Covid, min. of 5 clinical service hours/week
- **Opioid Treatment:**
  - Test for oxycodone and fentanyl
  - All required meds for DMC-ODS be onsite/available
  - 30-day notice: Track Naloxone distribution (any funding source)
  - ACBH Policy: Safety/Effectiveness of Med Use in DMC ODS
  - Coming soon: FY 21-22 Ex A-P



# Privacy & Security Requirement Sources

- **Federal & State Laws & Regulations**

- Health Information Portability & Accountability Act (HIPAA) (All health)

- 42 CFR Part 2 (SUD)

- California Welfare & Institutions Code 5328 (Mental Health)

- **Contract Provisions**

- Exhibit A-1: Standard Requirements, VI. Client Records, Data, Privacy, and Security Requirements

- [Exhibit E: Business Associate Agreement](#)

- [Exhibit A-3: Qualified Service Organization Agreement](#)



## Privacy & Security Requirement Sources (cont'd)

- **ACBH Policies & Procedures**

[#350-3-1: Privacy, Security, and Confidentiality Statement of Client Services, Records, and Information](#)

[#1704-1-1: Privacy & Security Incident Reporting Policy](#)



# Key Privacy Requirements

- **Protect all individually identifiable health information**
- **Minimum necessary rule:** limit the use, disclosure of, and requests for PHI to the minimum necessary to accomplish the intended purpose
  - Exceptions: treatment, disclosures to client, authorization (Release of Information)
- When in doubt, obtain a valid **Release of Information** to disclose Protected Health Information (PHI)
- Train all workforce and require Oath of Confidentiality for all staff at onboarding and annually



## Key Privacy Requirements (cont'd)

- **Report ALL privacy/security INCIDENTS, not just breaches, to Privacy Officer**
- **Mitigate** any harmful effect as a result of a breach
- Require any **agent or subcontractor** to follow Privacy Rule, Security Rule, and contractual requirements through written contracts through Business Associate Agreement/Qualified Service Organization Agreement
- Upon request of client or client representative:
  - Make PHI available in designated record set
  - Make accounting of disclosures available
  - Allow amendments to designated record set
- If contract is terminated, PHI must be returned or destroyed



## Special Requirements – Substance Use Disorder (SUD) Information

- **42 CFR Part 2 is generally more restrictive regarding use and disclosure and re-disclosure of SUD information from an SUD provider**
- **Releases of Information (ROIs) are almost always required to disclose or re-disclose SUD information**
  - Exceptions: medical emergency to medical provider, audit & evaluation, research
  - CARES Act will modify 42 CFR Part 2, to be revised TBD 2022
  - Note: ACBH will be issuing new SUD ROIs soon





## Key Security Requirements

- **Follow all Security Rule & HIPAA Security Regulations**
  - Implement administrative, physical, and technical safeguards
  - Perform risk analysis and management
  - Must have Security Officer
  - Must manage information access to follow minimum necessary requirement (i.e. role-based access)
- **Electronic Health Records must have warning banner concerning PHI**
- **Emails with PHI must be sent in a secure, encrypted manner**
- **Password management policies should include requiring passwords be changed every 90 days**



## Key Security Requirements (cont'd)

Notify ACBH IS immediately if any staff with access to PHI or PII through ACBH's applications (e.g., Clinician's Gateway, InSyst, Yellowfin) depart from the organization or change functions and no longer need this access so that ACBH can terminate/amend access.



## Privacy Incident Steps

- Notify ACBH Privacy Team **within 24 hours** of any **suspected** or actual breach of security, intrusion, and/or use/disclosure of PHI in violation of federal/state laws/regulations
- **Submit Privacy Incident Reporting Form** to ACBH via email [breachnotification@acgov.org](mailto:breachnotification@acgov.org); *will change to online format soon*
- **Investigate breach** and take prompt corrective action to address deficiencies and as required by laws/regulations
- **Provide written report** of investigation to ACBH Privacy Officer, including identification of each individual whose PHI has been breached within 15 working days of discovery of breach
- **Notify individuals of breach** following directions of ACBH



## ACBH Privacy & Security Team

- ACBH Privacy Officer: Sophia Lai, [Sophia.Lai@acgov.org](mailto:Sophia.Lai@acgov.org)
- ACBH Security Officer: Priya Bala, [Priya.Bala@acgov.org](mailto:Priya.Bala@acgov.org)
- ACBH Privacy Administrative Support: TBD
- HCSA Chief Compliance & Privacy Officer: Ravi Mehta, [Ravi.Mehta@acgov.org](mailto:Ravi.Mehta@acgov.org)



## Exhibit B-1: SUD Allocations

- **Allocation Worksheets were included in Contract Renewal Packages for all programs.**

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY			
DEPARTMENT OF BEHAVIORAL HEALTH			
SUBSTANCE USE DISORDER			
ALLOCATION WORKSHEET			
FISCAL YEAR 2021-22			
Contractor: (CBO Name)			
Contract Programs	Initial	COLA	Allocation
Program Name – Description	\$\$	\$\$	-
Program Name – Description	\$\$	\$\$	-
<b>TOTAL CONTRACT ALLOCATION</b>			<b>\$ -</b>
FY 21-22 Allocation pending Board of Supervisors approval			



## Ex B Review: Forms

- **Budget instructions included with the budget template**
  - Walkthrough of the budget template
  - Administrative Indirect Cost rate has 15% CAP
  - Costs must be reasonable and comply with regulatory requirements and any funding source restrictions
- **Budget Template – Required sections are:**
  - B-1 Funded Program Budget (Personnel & Operating Expenses)
  - Expense Detail Tab



## Ex B-1 Budget Review: Salaries & Benefits

- **FTEs:**

- Budget FTEs formulas based on a 40-hour work week
- Must meet minimum wage requirement for State and City
- Must comply with Level 1 of the Executive Schedule published by the United States Office of Personnel Management
- Must include incumbent staff name
- Please designate if the staff is an LPHA or SUD Counselor in the Treatment Credential column
- Staff who perform multiple roles in the same program (i.e. Supervisor and Direct Service) should be listed as a separate line on the Personnel tab for each role they perform



# Invoice Processing

- **Processed between three Units**
  - Contracts – ACBH
  - Accounts Payable – ACBH
  - Disbursements Division – Alameda County Auditor - Controller's Office
- **Payment remitted within 30 days**
- **Supplemental Claims**
  - Contract Finalization – Rate Differential
  - Fiscal Year End – Missed Units





## Cash Advances

- **County Policy**
  - No more than 1/12 of the annual contract allocation
  - Non-profit organizations **only**
  - Repayment terms as approved by ACBH
- **Employee Dishonesty and Crime (EDC) insurance coverage** limits must be greater than or equal to the requested cash advance amount
- EDC insurance coverage must include a **Loss Payee Endorsement**
- **New Form** (Excel format) on provider website  
<http://www.acbhcs.org/providers/network/forms.htm>



## Additional Reports Requests

- **INSYST reports sent to print queue**
  - 3rd business day of the month following the month of service
  - 15th day of the month following the month of service
  - Last day of the month following the month of service



## Other Resources

- **FY 21-22 Governor's Proposed Budget and May Budget Revision**  
[www.ebudget.ca.gov](http://www.ebudget.ca.gov)
- **Contracts webpage for CBO Providers**  
<http://www.acbhcs.org/providers/network/cbos.htm>
  - Provider or Program Change Notification Form
    - Notify ACBH of routine changes, e.g., Leadership
  - Program Change Request Form
    - Request ACBH approval of changes, e.g., sites or services



## Other Resources (cont'd)

- **Standard Contract Exhibits**
  - Some still being updated for next fiscal year
  - Exhibits A-1, A-2, B and others
  - Copies of key forms and policies, letters, and definitions
- **ACBH Policy Manual**  
<http://www.acbhcs.org/providers/PP/Policies.htm>



## Questions & Answers

- **Answers will be posted on website** <http://www.acbhcs.org/providers/network/cbos.htm>
- **Presentation and handouts will also be posted online**



**Alameda County Behavioral Health  
Care Services**

**thank you.**