| County of Marin | POLICY NO. MHSUS-ADP-17 |
| Mental Health & Substance Use Services (MHSUS) | Next Review Date: July, 2018 |
| PRIMARY PREVENTION SERVICES | Date Reviewed/Revised: July 30, 2015 |
| SUPERCEDES: MHSUS PROGRAMMATIC AND ADMINISTRATIVE POLICIES, PROCEDURES, STANDARDS AND PRACTICES FOR ALCOHOL, TOBACCO AND OTHER DRUG SERVICES | By: Suzanne Tavano, PhD MHSUS Director |

**POLICY: PRIMARY PREVENTION SERVICES**

**I. PURPOSE:**

To establish a procedure to ensure compliance with the requirements for Primary Prevention outlined in NNA/DMC State-County Contract, Exhibit A, Attachment 1.

**II. REFERENCES:**

NNA/DMC State-County Contract, Exhibit A, Attachment 1
Title 45 CFR, Part 96.125
Title 45 CFR, Part 96.121

**III. POLICY:**

It is the policy of Marin County Mental Health and Substance Use Services (MHSUS) to ensure compliance with the Substance Abuse Prevention and Treatment (SAPT) Block Grant on primary prevention as described in the SAPT Block Grant requirements (45 CFR 96.125).

MHSUS will not spend less than the allotted amount of SAPT funds on primary prevention services as defined in 45 CFR, Part 96.121. SAPT Primary Prevention funding shall be expended on a variety of primary prevention services directed at individuals not identified to be in need of treatment.

MHSUS and its contractors shall meet data reporting requirements for capacity, process and outcome as required by the SAPT Block Grant. MHSUS and its contractors shall also report data for the Center for Substance Abuse Prevention (CSAP) strategies and Institute of Medicine (IOM) prevention categories as listed in 45 CFR, Part 96.125.

MHSUS shall comply with the Strategic Prevention Framework (SPF) and shall submit SPF-required data to the California Department of Health Care Services (DHCS).

**IV. AUTHORITY/RESPONSIBILITY:**

Contract Managers
Alcohol and Drug Administrator
MHSUS Director
V. PROCEDURE:

The procedures listed below are to ensure that the County MHSUS and Primary Prevention contractors are in compliance with of funding sources and applicable laws and regulations.

Utilization of SAPT Primary Prevention Funding
1. MHSUS allocates SAPT Prevention Set-Aside funding for primary prevention activities outlined in the DHCS-approved Strategic Plan.
2. MHSUS conducts competitive bid processes to select contractors and includes language specifying compliance with SAPT Block Grant requirements, including the provision that funding shall not be used for individuals identified as needing treatment, in Request for Proposal and contract documents.
3. Annually, MHSUS submits to DHCS a Primary Prevention Mid-Year Budget indicating how the SAPT Block Grant 20% Primary Prevention Set-Aside shall be expended.
4. Contract Manager evaluates contractor’s expenditures monthly to ensure alignment with allowable expenses and services entries in CalOMS Pw.

Submission of Required Data
1. Data reporting in CalOMS Pw shall indicate services performed within appropriate CSAP Strategies and IOM categories as listed in 45 CFR, Part 96.125.
2. County and contracted providers are required to enter activity in CalOMS Pw as services occur, reflecting the date of service, on a weekly basis. All CalOMS Pw data shall be submitted with the monthly invoice no later than the 10th of the month for the previous month’s activity.
3. MHSUS Prevention Coordinator reviews CalOMS Pw entries on a monthly basis and ensures activities align with the primary prevention funding, activity and reporting requirements prior to approving payment for services.
4. MHSUS Prevention Coordinator reviews and releases data to DHCS for each quarter by the last day of the month following each quarter.

Strategic Prevention Framework
1. MHSUS develops and maintains a DHCS-approved Five Year Strategic Plan, which utilizes the SPF process and is inclusive of requisite SP-related data.
2. MHSUS requires County-performed and contracted services to be in alignment with approved SPF objectives and strategies and be included in scopes of work.
3. Monitor compliance through Contract Manager review and approval of scopes of work and budgets prior to contract execution and a monthly review of CalOMS Pv data.

Additional contractor compliance with the Primary Prevention policy shall be achieved through:

1. Distribution of the Contractor Manual, including all Primary Prevention contract requirements, annually at contract renewal.
2. Approval of contract as to form and legal affect by county counsel.
3. Signature of Contractor on contract agreeing to all conditions set forth in the contract.
4. Approval and execution of contract by the County Board of Supervisors or County Administrative Officer.
5. Annual completion of Self Audit by contractor, and subsequent review by MHSUS Contract Manager, including contractors signed attestation of adherence to all laws and regulations.
6. At annual Site Visit, Contract Manager shall review contractor policies regarding Primary Prevention to ensure compliance with federal, state and local requirements.
7. Completion of both mid-year and year-end progress report, and subsequent review by MHSUS Contract Manager. Progress reports ensure primary prevention services continue to align with county objectives and comply with state and federal requirements as defined in 45 CFR, Part 96.125.
8. Convene monthly meetings for Prevention contractors to review compliance with contract requirements and identify and respond to Technical assistance and training needs.