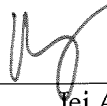


County of Marin Behavioral Health and Recovery Services (BHRS)	POLICY NO. BHRS-70
	Next Review Date: April 2024
POLICY:	Date Reviewed/Revised: April 21, 2021
<u>PRIMARY PREVENTION SERVICES</u>	By:  Jei Africa, PsyD Director, Behavioral Health and Recovery Services
MHSUS-ADP-17	

POLICY: PRIMARY PREVENTION SERVICES

I. PURPOSE:

To establish a procedure to ensure compliance with the requirements for Primary Prevention outlined in the State-County Substance Abuse Prevention and Treatment Block Grant (SABG) Contract.

II. REFERENCES:

State-County SABG Contract
BHRS-SUS-15 Expenditure of SABG
Title 45 CFR, Part 96.121, 96.124, 96.125

III. POLICY:

It is the policy of Marin County Division of Behavioral Health and Recovery Services (BHRS) to ensure compliance with the Substance Abuse Prevention and Treatment Block Grant (SABG) on primary prevention as described in the SABG requirements (45 CFR 96.125).

BHRS will not spend less than the allotted amount of SABG funds on primary prevention services as defined in 45 CFR, Part 96.121. SABG Primary Prevention funding shall be expended on a providing universal, selective, and indicated prevention activities and services for persons not identified as needing treatment. The program must target both the general population and sub-groups that are at high risk for substance abuse. The program must include, but is not limited to, the following strategies: Information Dissemination; Education; Alternatives; Problem Identification and Referral; Community-based Process; and Environmental.

The Friday Night Live/Club Live (FNL/CL) allocation must be used for FNL Mentoring, FNL Kids (4th to 6th grade), CL (middle school), or FNL (high school). FNL/CL is a statewide SABG funded prevention program that utilizes an evidence-based youth development framework. The allocation can be expended on Alternatives and Environmental.

BHRS and its contractors shall meet data reporting requirements for capacity, process and outcome as required by SABG. BHRS and its contractors shall also report PPSDS

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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.

BHRS 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
 BHRS Director
 Alcohol and Drug Administrator

V. PROCEDURE:

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

Utilization of SABG Primary Prevention and FNL/CL Funding

1. BHRS allocates SABG Prevention Set-Aside and FNL/CL funding for primary prevention and FNL/CL activities, respectively, outlined in the DHCS-approved Strategic Plan.
2. BHRS conducts competitive bid processes to select contractors and includes language specifying compliance with SABG 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, BHRS submits to DHCS a Primary Prevention Budget indicating how the SAPT Block Grant Primary Prevention and FNL/CL Set-Asides shall be expended.
4. Contract Manager evaluates contractor's expenditures and activities monthly to ensure alignment with allowable expenses and services entries in PPSDS.

Submission of Required Data

1. PPSDS data reporting 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 PPSDS as services occur, reflecting the date of service, on a weekly basis. All PPSDS data shall be submitted by the 5th of the month for the previous month's activity.
3. BHRS Prevention Coordinator reviews PPSDS 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. BHRS Prevention Coordinator reviews data monthly and quarterly.

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Strategic Prevention Framework

1. BHRS develops and maintains a DHCS-approved Five Year Strategic Plan, which utilizes the SPF process and is inclusive of requisite SPF- related data.
2. BHRS 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 PPSDS 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, County Administrative Officer, or designee.
5. Annual completion of Self Audit by contractor, and subsequent review by BHRS 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 and FNL/CL, as applicable, to ensure compliance with federal, state and local requirements.
7. Completion of both mid-year and year-end progress report, and subsequent review by BHRS 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.