

Carbon Co/Four Corners

GOVERNANCE & OVERSIGHT NARRATIVE

3 Year Plan (2024-2026)

Local Authority: Carbon Co/Four Corners

Instructions:

In the cells below, please provide an answer/description for each question. **PLEASE CHANGE THE COLOR TO BLUE, OF SUBSTANTIVE NEW LANGUAGE INCLUDED IN YOUR PLAN THIS YEAR!**

1) Subcontractor Monitoring

The DHS Contract with Mental Health/Substance Abuse Local Authority states: When the Local Authority subcontracts, the Local Authority shall at a minimum:

- (1) Conduct at least one annual monitoring review of each subcontractor. The Local Authority shall specify in its Area Plan how it will monitor their subcontracts.**

Describe how monitoring will be conducted, what items will be monitored and how required documentation will be kept up-to-date for active subcontractors.

FCCBH performs annual license verifications on the Utah Division of Occupational and Professional Licensing website. We obtain background criminal investigation (BCI) clearances annually for all individual clinical subcontractors. For clinical and respite subcontractors, we review their clinical records consistently. At least annually, we check the credentialing status of our subcontractors, and renew credentialing every three years. We may perform randomized site visits for off-site subcontractor providers. On a monthly basis, we check subcontractors for an exclusion status in both the List of Excluded Individuals/Entities database and the System for Award Management database. Our prescribers practice within our facilities or via telehealth and use our electronic health record and are subject to our ongoing internal monitoring, and quality control processes.

FCCBH requires all subcontractors to follow Medicaid and The Office of Substance Abuse and Mental Health clinical documentation requirements. Furthermore, FCCBH also audits for administrative documentation, quality of care and completion of duties. This includes insurance cards, correct coding, ROI (if applicable), and safety plans (if applicable), clinical license, acceptable malpractice insurance, background check, and business license. For external subcontractors, the initial assessment and treatment plan is required and reviewed for medical necessity before initial authorization is given for services. The same is required for ongoing authorizations.

For subcontracted organizations (for example inpatient facilities or residential facilities) FCCBH requires that subcontractors complete regular LEIE and SAM verification as well as verifying that all employed clinical staff are in good standing with DOPL.

By signing the confidentiality agreement, the organizational Provider provides acknowledgement that they shall perform their obligations related to disclosure of Protected Health Information (PHI) as that term is defined in Public Law 104-191.

Carbon County's Governance and Oversight:

Carbon County has one Commissioner assigned to sit on the FCCBH Board. He meets with them in all board meetings and regularly stays in touch with the Executive Director and her staff. He reviews budgets and approves many expenditures, policies and goals. FCCBH has a strong history of including the assigned Carbon Commissioner in most details that affect their business and their success.

The government of Carbon County has maintained a strong commitment to ensuring that FCCBH is successful in providing behavioral health needs to its citizens. Although they are not involved in the day to day operation of FCCBH, they are consistently made aware of the accounting and expenditures to ensure proper use of the money and resources that come from tax dollars.