



Utah Department of

Health & Human Services

Integrated Healthcare

SUMH G&O Narrative

State Fiscal Year 2027

Local Authority: Northeastern

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Overview

The purpose of this document is to meet contract compliance with the Local Authorities (LA) “Evergreen Contract” Article 1.2. “Office Directives” refers to the annual instructions promulgated by Department of Health and Human Services (DHHS), Office of Substance Use and Mental Health (SUMH), identified in Utah Code §26B-5-102(2). These directives describe the use and allowable expenditure of state and federal funds for the purpose of mental health and substance use prevention, crisis, treatment, and recovery support services.

This document is designed to be an addendum to the “Evergreen Contract”. It is updated prior to the start of the State Fiscal Year and may be updated during the State Fiscal Year when approved by the SUMH director or designee. DHHS will alert LA leadership via email to any updates to this document after the start of the State Fiscal Year. The LA is responsible to review both the “Evergreen Contract” and this document to ensure contract compliance.

Governance and Oversight (G&O)

General Auditing

Describe how auditing will be conducted, what items will be monitored and how required documentation will be kept up to date. [State Code 26-B-5-102\(2\)\(ee\)](#)

Northeastern Counseling Center (NCC) has one external contract that is monitored by Northeastern Counseling on an ongoing basis. This contract is for Medicaid services provided under San Juan Counseling. San Juan Counseling is sub-capitated under the NCC for Medicaid members and services that are part of the PMHP in San Juan County. San Juan Counseling is monitored throughout the year by inclusion with Northeastern Counseling's Medicaid External Quality Review Organization (EQRO) reviews including, HEDIS Measures, Grievances, Credentialing, Performance Improvement Projects, Adverse Benefit Determinations and appeals, Policy Review and Medicaid financial audits. San Juan Counseling is a member of the NCC Quality Review Committee. NCC has access to the San Juan Counseling Medical Record system and submits Medicaid encounters from San Juan Counseling under Northeastern Counseling's PMHP. San Juan Counseling is also monitored annually by the Office of Substance Use and Mental Health.

As part of the Utah Medicaid PMHP Managed Care program NCC credentialed providers of Medicaid services are reviewed and re-credentialed or terminated per CFR regulations and the contract with the Utah Department for Health and Human services for the Medicaid program. These credentialed providers include hospitals, residential programs, individual providers e.g. therapists, etc. Medicaid does not deem provider credentialing as "subcontracts." Credentialed providers for PMHP Medicaid members must agree to the PMHP provider provisions as identified in the Provider Agreement including policy adherence and involvement in the NCC Quality Improvement Program which includes service review, utilization, quality, OQ/YOQ outcomes, etc.

Fiscal Auditing

The [Service Code Auditing Guidelines](#) identify the mental health and substance use disorder treatment service codes that require documentation of services to be uploaded by spreadsheet for the audit. Services that can not be described by CPT/HCPCS code such as prevention, FRF and MCV (MCOT Vehicle costs) can be audited by providing a summary of invoices billed to Kissflow. There shall be a tab for each funding code utilized in the fiscal year.

Service Code Auditing Guidelines

The service code auditing guidelines are located at the end of the FFY for the Fiscal Year. These are the guidelines that the auditor uses to justify year end costs:

Has the LA read the guidelines provided in the FFH? **Yes** No

Are there any issues with complying with these guidelines with any service code allocated to you for FY27? Yes **No**

If there are any issues please identify each code and give an explanation:

Subcontractor Auditing and Tools

A list of subcontractors/subrecipients shall be provided prior to the audit. The subcontractor monitoring tool developed by SUMH shall be used in monitoring subcontractors. Subcontractor audits should be designed to evaluate the quality of services being provided, identify areas for improvement or training of subcontractors to help improve outcomes, ensure compliance with statute and office directives and provide accountability for state and federal funding. Explain how you use the provided state monitoring and other tools developed to fulfill the requirement of annually monitoring each subcontracted provider. ([See FY27 Office Directives Subcontractor Monitoring Review \(1\) page \(5\)](#))

With provider agreements including the subcontract with San Juan Counseling monitoring is ongoing and built into the Medicaid processes. NCC is required to have a Peer Review

program under the PMHP contract that is part of the Quality Improvement Program approved by Medicaid. This includes reviewing provided services by San Juan Counseling and other credentialed Medicaid providers using the NCC Peer Review check list. In addition, San Juan Counseling and other Medicaid PMHP credentialed providers are subject to EQRO monitoring as they are under the NCC PMHP. Prior to payment for services provided, a short NCC check list is used to review services being funded. This includes ensuring Medicaid eligibility, reviewing service notes and to ensure services funded are recorded and reported to SUMH and Utah Medicaid. NCC is required to search providers monthly for Federal Exclusions that may disqualify a provider from participating in the Medicaid program. Medicaid requires that providers are re-credentialed at least every three years. NCC obtains copies of liability insurance certificates annually for non employed providers.

Mechanisms for Citizen Input

Are you currently receiving public input and comments in the development of the annual area plan and budgets? State Code [17-77-301\(5\)\(a\)\(vii\)](#), [17-77-201\(5\)\(g\)](#)

NCC does receive public input and occasional comments in the development of the annual area plan and budgets. The most common form of input is from community stakeholders.

How do you, or will you, solicit public comments and input on your annual area plan and budgets?

NCC holds a public meeting every year where Area Plan discussion is on the agenda. The public may attend and speak and provide input to the Area Plan as desired. NCC is part of several community boards, committees and projects involving other community stakeholders including Health Care, Law Enforcement, education, Children Justice Center(s), CCJJ committees, state committees, etc. Most of these interactions are ongoing throughout the year and on occasion may include discussions that would be pertinent to the Area Plan, e.g. developing of a receiving center in Vernal.

How do you track this public input? (Please provide supporting docs)

Input would be included in minutes from public meetings or other community committee minutes. If administration was contacted by individuals or a group a note would be completed.

Did you receive any input for the FY27 Area Plan?

NCC did not receive individual input for the FY27 Area Plan except as provided by

Stakeholders throughout the year regarding services to specific populations such as criminal justice and the potential receiving center services.

Who are the local advocates and coalitions that will be invited to the public review of the Area Plans and Budgets for FY27?

NCC is not opposed to inviting local advocates that may exist to provide review or input to the plan. Additional, formal groups may be limited in the local area and need to be identified or formed. Suicide prevention groups, schools, health care, local health department, youth coalitions are part of the prevention planning process and may include treatment input. This generally occurs during PAC meetings or other prevention interactions.

If none were invited to participate, who are the local coalitions and advocates that should be invited to participate this year for FY27?

Citizens, stake holders, etc., are invited to participate in the public Area Plan meeting held annually. This meeting is posted according to Utah Code requirements. NCC will continue to be open to Area Plan development or input from any individuals, stakeholders or advocacy groups.

Policies Procedures and Auditing

Per the [FY27 SUMH Office Directives](#), each LA shall develop, implement, and maintain written policies and procedures that encompass all requirements, including:

- i) governance and oversight,
- ii) substance use disorder prevention services,
- iii) suicide prevention services,
- iv) crisis services,
- v) mental health treatment services,
- vi) substance use disorder treatment services,
- vii) recovery support services,
- viii) data reporting, and
- ix) grant and contract reporting.

Does the Local Authority have the policies above in place? Yes No
Are the policies up to date (5 years or less)? Yes No
Please provide these policies with your uploads

Additional Policy Auditing
Does the Local Authority have the policies below in place? Yes No
Are the policies up to date (5 years or less)? Yes No
Please provide these policies with your uploads. See the Governance and oversight policy.

The following audit items are located in the [SUMH FY27 Monitoring Handbook](#).

- A) Corrective Action Policy
- B) Standardized finding format
- C) Standardized CAP Tool/Root Cause Format
- D) Standardized Operating Procedure for CAP's
- E) Quality and Effectiveness Standards for Subcontractor Monitoring
- F) A Link to the FY27 Standardized Audit Tool