



Utah Department of

Health & Human Services

Integrated Healthcare

SUMH G&O Narrative

State Fiscal Year 2027

Local Authority: Summit County

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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\(2\)\(ee\)](#)

Summit County operates as a contracted network model with all services funded through the Office of Substance Use and Mental Health (OSUMH), being provided by the University of Utah's Huntsman Mental Health Institute (HMHI). To ensure the highest level of care and fiduciary management, the following monitoring and auditing elements have been incorporated into the service contract between Summit County and the Huntsman Mental Health Institute and are applied on the following schedule.

Yearly:

- On or before August 30th of each year, the Behavioral Health Director and Huntsman Mental Health Institute staff review the past 12 months of operational costs in relation to services provided to clients covered under the Service Contract. The purpose of this review is to evaluate both the Operational Cost Offset and the current service rates.
 - Should a change to the Operational Cost Offset be requested, a proposal will be presented to the Behavioral Health Executive Council for review and then forwarded on to the Summit County Council for discussion and possible action for the coming County fiscal year, beginning on January 1.
 - Should a change to rates be justified, a letter outlining the proposed new rates will be submitted to the Office of Substance Use and Mental Health for review and approval, with implementation effective July 1 of the following Office of Substance Use and Mental Health's fiscal year.
- Each October, Davis Behavioral Health is contracted to conduct an annual records review on behalf of the Behavioral Health Division of Huntsman Mental Health Institute to ensure that the current record requirements outlined in the Office of Substance Use and Mental Health Directives are being met.

General Auditing

- In coordination with the above records review conducted by Davis Behavioral Health, the Behavioral Health Division administers a yearly subcontractor audit of Huntsman Mental Health Institute, utilizing the current tool approved and distributed by the Office of Substance Use and Mental Health.
- At the end of October, a report incorporating the above information was compiled and reviewed with the Behavioral Health Division and Huntsman Mental Health. Should a significant deficiency be reported, the Behavioral Health Executive Council will meet with Huntsman Mental Health Institute to review actions to address the identified deficiencies and establish a plan to address them. A score of 94 or lower, out of 100, triggers this meeting.

Quarterly:

- The Behavioral Health Director confers annually with the Office of Substance Use and Mental Health Data Director to ensure that required data sets affiliated with the corresponding Office of Substance Use and Mental Health funds are being submitted and accepted within the required parameters as outlined on the Office of Substance Use and Mental Health's website (<https://sumh.utah.gov/data-reports/data-specs/>). These reports include:
 - Mental Health Data Specifications
 - SUD Events Data Specifications
 - TEDS Discharge Specifications
 - TEDS Admit Specifications
 - Recovery Support Specifications
 - Early Intervention Specifications
 - Other reports requested by the Office of Substance Use and Mental Health in accordance with updates to the Directives.
- Each quarter, the Behavioral Health Director meets with Huntsman Mental Health Institute staff to review operational costs against the

General Auditing

Operational Cost Offset, as defined in section III.4 of the service contract.

Monthly:

- Each month, on or before the 15th, the Behavioral Health Director meets with Huntsman Mental Health Institute clinical and administrative staff to review treatment data in preparation for billing to the Office of Substance Use and Mental Health.
- Each month, the Behavioral Health Director conducts a random spot check of four to eight client charts to ensure proper documentation is maintained, using the model developed by Weber Human Services. This includes, but is not limited to:
 - Date, start and stop times, duration of service,
 - The setting in which the service was rendered,
 - Specific service rendered (documentation matches CPT Code submitted to Behavioral Health Division for payment),
 - Clinical note documentation on individual(s) present during the session,
 - Treatment goals outlined,
 - Documentation of treatment goals addressed and progress towards goals,
 - Signature and credentials of the individual providing the service.
- Additionally, the following monthly reports are provided to the Behavioral Health Executive Council for review each month:
 - Number of Clients seen the previous month,
 - Number of services provided, separated into mental health and substance use disorders,
 - Number of Latinos services provided for the previous month.

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:

Regarding the JRI-MH from last year, those funds were used by HUB prior to being able to provide data. You should be seeing data on them this year for OSUMH funds. Additionally, once the funds were exhausted, we continued to cover services with county funds.

Regarding the JRI-MH from FY25, those funds were used by HUB prior to being able to provide data. You should be seeing data on them this year for OSUMH funds. Additionally, once the funds were exhausted, we continued to cover services with county funds.

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](#))

Summit County operates under a contracted network model, with all services funded through the Utah Office of Substance Use and Mental Health (OSUMH) and provided by the University of Utah's Huntsman Mental Health Institute (HMHI). Huntsman Mental Health Institute is the only subcontractor currently receiving funding from the Utah Office of Substance Use and Mental Health. The Behavioral Health Executive Council implemented a policy that allows only providers who can meet all reporting requirements of the Office of Substance Use and Mental Health to access funding provided by the Office of Substance Use and Mental Health.

As outlined in the *"General Auditing"* section of this document, the Behavioral Health Division uses the Utah Office of Substance Use and Mental Health's general auditing tool for chart review, fiscal evaluation, and the annual establishment of risk level (using Utah Office of Substance Use and Mental Health metrics). For chart review, the Behavioral Health Division has contracted with Davis Behavioral Health to provide this service, utilizing the forms established by the Utah Office of Substance Use and Mental Health. Additional documentation utilized during the audit includes:

- Copy of the "University of Utah Annual Comprehensive Fiscal Review" report. This is utilized as Huntsman Mental Health Institute operates as an arm of the University of Utah and is incorporated within the audit.
- Copy of the Huntsman Mental Health Institute's Park City organization staffing chart.
- Copy of Huntsman Mental Health Institute's Certificate of Liability Insurance.
- Copy of all client confidentiality forms used by Huntsman Mental Health Institute.
- Copy of all client admissions forms used by Huntsman Mental Health Institute.
- Copy of Huntsman Mental Health Institute's "Patient Rights & Responsibilities" policies.
- Copy of Huntsman Mental Health Institute's "Rights and Protections Against Surprise Medical Billing" notice to clients.
- Copy of Huntsman Mental Health Institute's outpatient treatment license for the Park City Clinic.
- Copy of conflict of interest forms for all Park City Huntsman Mental

Health Institute staff.

Regarding the Utah Office of Substance Use and Mental Health monitoring form, the Behavioral Health Division has added a tab to provide a summary of results and establish an overall score out of 100 possible points. Any score at or below 94 triggers a meeting between the Behavioral Health Executive Council and the Huntsman Mental Health Institute to review the areas' deficiencies. Per the terms of subsection V.B of the Service Contract, Huntsman Mental Health Institute has ten (10) days to develop and present a corrective action plan to the Behavioral Health Executive Committee for review and approval.

Should Huntsman Mental Health Institute fail to meet the metrics for approval identified in the corrective action plan approved by the Behavioral Health Executive Council, per the Service Contract, a Notice to Cure may be issued requiring Huntsman Mental Health Institute to be in compliance within thirty (30) business days. Failure to meet this deadline may result in financial penalties or, in extreme situations, termination of the Service Contract.

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\(5\)\(g\)](#)

Yes

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

Upon completion of the draft Area Plan by the Behavioral Health Division, and prior to submission to the Summit County Council for legislative approval, the Behavioral Health Executive Council reviews the plan and provides preliminary feedback at their April meeting.

Once reviewed and approved by the Behavioral Health Executive Committee, the Area Plan is submitted to the County Council and is incorporated into the Council's public agenda and meeting packet. Once incorporated, the full plan is available for public review through the Summit County Clerk's website

(<https://www.summitcountyutah.gov/2341/Meeting-Minutes>).

During the County Council meeting the following week, public input may be provided. Should the County Council wish to make any changes to the Area Plan, the Behavioral Health Division has twenty-four hours to incorporate the changes and resubmit the Area Plan to the County Council for incorporation in the next week's meeting packet in order to have the plan submitted by May 16th of that year, per the requirements of State Code.

Voting Membership to the Behavioral Health Executive Committee includes:

- Two Summit County Council Members
- Park City Council Member
- Summit County Attorney
- Summit County Sheriff
- Director of the Summit County Health Department
- Representative of the Park City Hospital
- Representative of the Latino Community
- Two local non-profits engaged in behavioral health or social services support
- Local psychiatrist practicing in Summit County
- Representative of a local education authority
- Behavioral Health Director

Non-Voting Membership to the Behavioral Health Executive Committee includes:

- Behavioral Health Prevention Director
- Behavioral Health Latino Outreach Coordinator
- Healthy U. Behavioral Medicaid Director
- Huntsman Mental Health Institute Outpatient Clinics Director
- Hunsman Mental Health Institute, Park City Clinical Director
- Mental Wellness Alliance Director

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

Input from the Behavioral Health Executive Committee is incorporated directly at the April meeting.

Public comment made at the Summit County Council meeting is recorded in the public minutes and available to the public in accordance with state statutes. Minutes of the

meeting can be found on the Summit County Clerk's website (https://www.summitcountyutah.gov/2341/Meeting-Minutes).
Did you receive any input for the FY27 Area Plan?
No additional public input was received at the County Council Meeting held May 6th, 2026
Who are the local advocates and coalitions that will be invited to the public review of the Area Plans and Budgets for FY27?
All meetings of the County Council are notified in accordance with state statutes and open to the public. Additionally, members of the Summit County Mental Wellness Alliance are invited to the meeting.
If none were invited to participate, who are the local coalitions and advocates that should be invited to participate this year for FY27?
NA

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

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