


County of Marin <b>Behavioral Health and Recovery Services (BHRS)</b>	POLICY NO. BHRS-70
	Next Review Date: April 2027
<b>POLICY:</b>	Date Approved: April 19, 2024
<b><u>PRIMARY PREVENTION SERVICES</u></b>	By:  _____ Todd Schirmer, PhD, CCHP 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 Use Prevention and Treatment Block Grant (SUBG) Contract.

**II. REFERENCES:**

State-County SABG Contract  
BHRS-69 Expenditure of SUBG Policy  
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 Use Prevention and Treatment Block Grant (SUBG) on primary prevention as described in the SABG requirements (45 CFR 96.125).

BHRS will not spend less than the allotted amount of SUBG funds on primary prevention services as defined in 45 CFR, Part 96.121. SUBG 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 SUBG 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 SUBG. BHRS and its contractors shall also report

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prevention data in Ecco 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  
 HHS Prevention Coordinator

**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 SUBG Primary Prevention and FNL/CL Funding

1. BHRS allocates SUBG 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 and Application indicating how the SUBG Grant Primary Prevention allocation shall be expended.
4. Annually, BHRS enters into an agreement with the California Friday Night Live Partnership regarding the FNL/CL funding and services.
5. Contract Manager evaluates contractor’s expenditures and activities monthly to ensure alignment with allowable expenses and services entries in Ecco.

Submission of Required Data

1. Ecco 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 Ecco as services occur, reflecting the date of service. All Ecco data shall be submitted by the 5<sup>th</sup> of the month for the previous month’s activity.

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3. BHRS Prevention Coordinator reviews Ecco 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 and ensures data is valid, timely, accurate, unique, thorough and auditable.
5. HHS Fiscal prepares and submits a quarterly QFFMR to DHCS and annual invoice to CFNL as outlined in BHRS-69 Expenditure of SABG Policy.

Strategic Prevention Framework

1. Unless or until DHCS supersedes current guidance, 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 Ecco 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 bi-monthly meetings, or more frequently as requested, for Prevention contractors to review compliance with contract requirements and identify and respond to technical assistance and training needs.