



# Measure 110 (M110) Behavioral Health Resource Network (BHRN) BHRN Partner Onboarding: Frequently Asked Questions (FAQ)

#### Table of Contents

Project Kick-Off	2
Project Funding and Reimbursement Process	2
Subcontracting	4
Providing Services	5
Housing	6
BHRN Partner Project Fiscal Reporting	6

The Oregon Health Authority, Health Systems Division ("OHA") on behalf of the Oversight and Accountability Council (the "OAC"), will periodically update Behavioral Health Resource Networks ("BHRN") grantees, through this published FAQ document, on pertinent information regarding grant deadlines, grant language clarifications, and other issues and concerns that arise during the grant cycle. Grantees should routinely review this document for updates. For a programmatic data specific FAQ, please refer to the M110 Resources page. For additional detailed guidance on M110 topics, please refer to OHA's YouTube playlist of M110 training sessions.

Nothing in this document changes or is intended to change the terms and conditions in any grant agreement.

### Project Kick-Off

What if we have questions not addressed in this FAQ?

Please email us at M110.Grants@odhsoha.oregon.gov.

Our organization has an executed Grant Agreement and an MOU with other BHRN participants. When can we begin incurring expenses and start providing services?

Your grant agreements are retroactive to July 1, 2022. You may use Measure 110 funding for expenses and services beginning on that date.

#### When are BHRN grant recipients required to submit required policies and procedures?

Given that the guidelines/templates are still forthcoming from the OAC, we are extending the policies and procedures submission date for all BHRN Partners. You will not be required to submit your policies formally until 90 days from when you receive the guidelines/templates.

#### When are grant recipients required to submit patient insurance submission plans?

For grant recipients with grant agreements that require grant recipients to submit patient insurance submission plans, OHA waives the requirement to submit patient insurance submission plans. However, grant recipients must continue to comply with the terms and conditions of their grant agreements, including the requirements that grant recipients bill insurance where applicable and maintain records that demonstrate that grant recipients are billing insurance where applicable.

If we are in multiple counties, do we need to submit one Certificate of Insurance or an individual Certificate for each county?

For grant recipients in multiple counties, grant recipients must comply with the insurance requirements in all of its grant agreements. If a single certificate of insurance clearly shows that the grant recipient meets the insurance requirements under all of its grant agreements, then a single certificate may be sufficient. But, if a grant recipient has multiple grant agreements for services in different counties, the grant recipient must submit a certificate, or combination of certificates, that is broad enough to include services across all of the counties it serves and to meet the requirements under all of its grant agreements.

Where should Project Milestone deliverables be sent (e.g., Certificates of Insurance)

Required documents should be sent to <a href="mailto:m110.grants@odhsoha.oregon.gov">m110.grants@odhsoha.oregon.gov</a>.

# Project Funding and Reimbursement Process

#### How will our organization receive our initial disbursement of funds?

Quarterly fund disbursements will be sent to BHRN Partners within 10 days of the end of each quarter. BHRN Partners do not need to perform any actions to receive the fund disbursement as it will be provided on an automatic schedule.

To submit a direct deposit form; a download link can be found on the right-hand side of the M110 page here, under BHRN Grants.

The initial disbursement of funds to a BHRN Partner occurred within 20 days of MOU submission. Partners chose to receive either 40% payment upfront with quarterly payments thereafter or even quarterly payments.

Our BHRN has been provided funding through 2023 - as we build new services, what funding will continue in 2024 and beyond? Will we need to reapply for funding?

On Wednesday, September 29, 2022, the Measure 110 Oversight and Accountability Council (OAC) approved an option for BHRN providers to receive an 18-month grant extension through June 2025. Current BHRN grants expire in December 2023. A grantee that is interested in continuing to provide services through June 2025, and is in substantial compliance with the current grant terms, would be offered additional funding to continue approved Measure 110 activities.

We ask that BHRN Partners respond to a <u>survey</u> letting us know whether you think you will want to continue to provide Measure 110 activities through June 2025. Your answer is not binding, but it helps us assess whether additional providers may be needed in your county. We understand that ultimately your decision whether to agree to a grant extension may depend on the level of funding that is available.

Beginning in January, OHA will conduct grant assessments and work with approved providers on budgets for the 2024-2025 grant extension period. The goal is to have all grant amendments signed by the end of June 2023.

Where can we find the Oregon Accounting Manual's requirements for travel costs as required by the agreement (Exhibit A, Part 2, 1.b.iii)?

Please find the Oregon Accounting Manual here which lists the travel costs requirements.

If we are a Medicaid Provider, are we able to use M110 funds as a payer of last resort?

BHRN Partners, who are authorized Medicaid providers, should bill Medicaid for Medicaid eligible services. BHRN Partners should consider a Medicaid claim payment as payment in full for a given service. The BHRN Partner can use M110 funding if the service is ineligible for Medicaid, if you are unable to determine if the client has insurance, or if you do not have access to the client's insurance information.

What if a client has Medicaid through a CCO that does not cover services at our organization, and that CCO will not authorize services from us? Can we use M110 funds for those services?

If the CCO does not cover the service, you will need to contact the CCO for claims assistance. Only after you have a final denial, you can use M110 funding as a payor.

### Subcontracting

I am a M. 110 grantee and I am entering into contracts with other businesses for administrative services/overhead like accounting, technical assistance, and legal services. Do I need to get that contract approved by the Oversight and Accountability Council (OAC)?

No, as long as those administrative/overhead services fall within your approved budget for administrative services/overhead. You only need OAC approval of a subcontract if the contractor will be performing some function that you are required to perform under your grant agreement. For example, if you contract with a business to collect client and fiscal data for you and to submit that data to the Oregon Health Authority and the OAC, that is a subcontract that needs approval. If you are contracting with a person to perform all or part of a service that you are supposed to do, you have to get that subcontract approved by the OAC.

As a M. 110 grantee, can I enter into a contract with a business to manage all or most of my M. 110 funds, and transfer all the grant funds I receive to them? And do I need to have this contract approved by the OAC because it is considered a subcontract under the grant agreement?

Only you as the grantee can receive the M. 110 funds directly from the OAC. If the entity you want to be the fiscal manager is not the named grantee, then the fiscal manager cannot receive the funds directly from the OAC. Instead, as the grantee you would need to transfer the funds to the fiscal manager. If the contractor will be receiving funds as compensation for fiscal management, those costs must be included within your approved budget. For example, if the fiscal manager assesses a 3% fee on the funds it manages for its services, then that fee must fit within your approved budget. If the fiscal manager is only helping you to manage the grant funds and is not going to be performing any other function that is required in the grant agreement, then your contract with the fiscal manager would not be considered a subcontract under the grant, and no OAC approval would be required.

What if I'm not sure whether a contract I'm entering into, is a subcontract that requires OAC approval?

If you aren't sure, contact your grant administrator.

### What is the process for requesting approval of a subcontract?

Send a request for OAC subcontract approval to your grant administrator (the grant administrator is identified in your grant agreement). Your request should address whether your budget will need to be amended because of the subcontract. If your budget does need to be amended, please include a request for budget modification explaining how you want the budget modified. Attach the subcontract to the request, and make sure the subcontract meets the requirements in Exhibit B Section 14 of the grant. If it doesn't, your request will not be presented to the OAC.

Your grant administrator may have additional questions for you. Once your request is considered complete, OHA will put the matter on an OAC agenda for consideration and will

notify you of the meeting where your request will be considered. Once the OAC has acted on your request, you will be notified of the decision.

## **Providing Services**

Are we restricted to only serve individuals with a Class E violation?

No; BHRN providers must use M110 funds to serve any individual who uses substances or who has a substance use disorder and is seeking services. BHRN providers cannot restrict M110-funded services to only individuals who receive a Class E violation.

Are Measure 110 funds only to be used on existing clients?

No; Measure 110 funds must be used to serve any individual who uses substances or who has a substance use disorder and is seeking services, whether that is a new client or an existing client.

We see some services attract individuals from out-of-state (housing). Are there any guidelines to be aware of within the BHRN when it comes to service those outside of our county/state? For context, we get people calling from out of state to begin to arrange services before they travel here (sometimes as far as Texas).

BHRNs must serve all those in need of services, regardless of their residency or citizenship status.

Do participants assisted with M110 grant funds need to be a resident of the funded county? For example, if a resident of Polk County seeks services in Marion County, can a Marion County provider utilize M110 funds to serve that client?

Providers should not turn away clients based on their residency. All clients, regardless of their county of residents, may be served using M110 funds.

What are the requirements for titling vehicles or any other special reporting requirements around vehicle purchases we need to know about?

The full requirements for titling vehicles purchased using Measure 110 funds can be found in Exhibit A of your grant agreement. Within five (5) calendar days of acquiring a vehicle, you must forward by e-mail a copy of the title application showing the OAC c/o Oregon Health Authority, Health Systems Division as the Security Interest Holder to the Measure 110 Inbox and CC AMHcontract.Administrator@dhsoha.state.or.us.

The Security Interest Holder information as follows: OAC c/o Oregon Health Authority Health Systems Division 500 Summer Street NE Salem, OR 97302

Vehicles purchased with Measure 110 funds must be used for Measure 110-funded activities for the useful life of the vehicle or five years whichever is less.

### Housing

#### Does housing that is funded by Measure 110 need to be licensed by OHA?

Not all housing must be licensed. It depends on the circumstances of each program. Each housing program must review the features of their program to determine if they need to be licensed. For example, to the extent that a housing program meets the definition of community-based structured housing, that program must be registered with OHA under ORS 443.480-443.500, but does not need to be licensed. If there are questions about whether a particular housing program must be licensed or registered, grantees may reach out to M110.grants@odhsoha.oregon.gov for assistance.

### BHRN Partner Project Fiscal Reporting

On what timeline will BHRN Partners submit *fiscal data reports*?

BHRN Partners must submit the following fiscal data reports:

**Budget Report Template:** The <u>Budget Report Template</u> was a one-time use reporting tool that validated BHRN Partner's program budgets across the five key budget categories. The report was due on October 14, 2022.

**Budget Adjustment:** As operational conditions and plans change, the Budget Adjustment Request Form can be used to request changes to BHRN Partner's budget within the guidelines. While initial budget adjustment requests were due on November 4, 2022, there will be opportunities for quarterly budget adjustments in the future.

**Expenditure Report:** The Expenditure Report will be used by BHRN Partners to report quarterly expenditures of M110 funds. The template is organized by budget categories and service areas. Initial submissions are due December 31, 2022. Reoccurring submissions are due on the last day of the current quarter for expenses incurred in the previous quarter. The Expenditure Report Template will be released shortly.

#### What are the specific record retention requirements?

Reporting documents have a required retention period of 6 years and can be maintained digitally. Please refer to the Grant Agreement, Appendix A, Section 4 for more details.

The application process asked for 19-month budgets, but we now only have 16 contract months to spend these dollars. How are we able to revise our budgets to reflect an accurate estimate of our spending?

The M110 Oversight and Accountability Committee delegated authority to OHA to approve certain budgetary changes. All M110 funding recipients should be working to update their budget to reflect the service areas that were approved, and make adjustments to fit the time left to provide those services. If your changes do not exceed your total approved contract amount, stay within the service areas that you were approved to provide, and do not move

money into a different category by more than 25% of your total budget, OHA can approve those changes.

The Budget Adjustment Request Form can be used to request changes to BHRN Partner's budget within the guidelines. While initial budget adjustment requests were due on November 4, 2022, there will be opportunities for additional budget adjustments in the future.