

State of Utah
Department of Human Services
Division of Substance Abuse and Mental Health



Site Monitoring Report of

Utah County's Department of Drug and Alcohol Prevention and
Treatment

Local Authority Contract #122419

Review Date: January 6th, 2015

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Section One: Report Information

Background

Utah Code Section 62A-15-103 outlines duties of the Division of Substance Abuse and Mental Health. Paragraph (2)(c) states that the Division shall:

- Consult and coordinate with local substance abuse authorities and local mental health authorities regarding programs and services,
- Provide consultation and other assistance to public and private agencies and groups working on substance abuse and mental health issues,
- Receive, distribute, and provide direction over public funds for substance abuse and mental health services,
- Monitor and evaluate programs provided by local substance abuse authorities and mental health authorities,
- Examine expenditures of any local, state and federal funds,
- Monitor the expenditure of public funds by local substance abuse authorities and mental health authorities,
- Contract with local substance abuse authorities and mental health authorities to provide a continuum of services in accordance with division policy, contract provisions, and the local plan
- Assure that these requirements are met and applied uniformly by local substance abuse authorities and mental health authorities across the state,
- Conduct an annual program audit and review of each local substance abuse authority and mental health authority in the state and its contract provider in a review and determination that public funds allocated to by local substance abuse authorities and mental health authorities are consistent with services rendered and outcomes reported by them or their contract providers,
- Each local substance abuse authority and each mental health authority is exercising sufficient oversight and control over public funds allocated for substance abuse and mental health programs and services, and
- Other items determined by the division to be necessary and appropriate.

In accordance with these and other instructions, the Division of Substance Abuse and Mental Health (also referred to in this report as DSAMH or the Division) conducted its annual program audit and review of Utah County's Department of Drug and Alcohol Prevention and Treatment (also referred to in this report as UCaDDAPT or the County).

Non-Compliance Issues, Action Plans and Timelines

This report is organized into individual sections, in which inadequacies will be identified and discussed. Inadequacies are assigned a level of severity based on the combined judgment of the monitoring team. In order to fully understand the degree of severity, a short discussion of the inadequacy levels follows.

A **major non-compliance issue** is non-compliance in contract requirements which affect the imminent health, safety, or well being of individuals. In cases of non-compliance at this level, a written corrective action plan must be completed by the Local Authority immediately and compliance must be achieved within 24 hours or less.

It should be noted that in extreme cases where, in the professional opinion of the monitoring team, an elevated threat of imminent health, safety, or well being of individuals exists, contract payments may be suspended indefinitely.

A **significant non-compliance issue** is either 1) non-compliance with contract requirements that do not pose an imminent danger to clients but that result in inadequate treatment or care that jeopardizes the well being of individuals; OR 2) non-compliance in required training, paperwork, and/or documentation that are so severe or pervasive as to jeopardize the effectiveness of services and continued contract funding. This type of finding will also require the submission of a written corrective action plan in which the Local Authority identifies the steps it will take to rectify the issue and a time frame for accomplishing the correction. The due date for this submission shall be within 10 working days of receipt of the draft monitoring report by the Local Authority. Compliance must be achieved within 30 days of receipt of the draft monitoring report. Verification of the resolution may be accomplished in several ways including a follow-up visit, measurement during the next site review, a review of training documentation, a review of data submitted subsequent to the correction or a combination of these or any other method determined adequate to measure the resolution.

A **minor non-compliance issue** results when the reviewers identify a performance inadequacy that is relatively small in scope and does not impact client well being or jeopardize funding. This type of finding will require the submission of a written corrective action plan in which the Local Authority identifies the steps it will take to rectify the issue and a time frame for accomplishing the correction. The due date for this submission shall be within 15 working days of receipt of the draft monitoring report by the Local Authority. Compliance must be achieved within 60 days of receipt of the draft monitoring report. Verification of the resolution may be accomplished in several ways including a follow-up visit, measurement during the next site review, a review of training documentation, a review of data submitted subsequent to the correction or a combination of these or any other method determined adequate to measure the resolution.

A **deficiency** results when the contractor is not in full compliance, but the deficiency discovered is not severe enough to require a formal action plan. However, the monitoring team may request action to fix the problem by a given date.

A **recommendation** occurs when the contractor is in compliance. The Division is simply making a best practice or technical suggestion. The contractor is encouraged to implement the suggestion but not required.

In rare instances, a non-compliance issue from a previous year may continue unresolved at the time of the monitoring site visit. A recurring non-compliance issue will be prominently displayed in the current monitoring report and will require special attention by the Local Authority to ensure its immediate resolution.

Section Two: Site Monitoring Report

Executive Summary

In accordance with Utah Code Section 62A-15-103, the Division of Substance Abuse and Mental Health conducted a review of Utah County's Department of Drug and Alcohol Prevention and Treatment on January 7th, 2015. The focus of the review was on governance and oversight, fiscal management, substance abuse prevention and treatment services and general operations.

The nature of this examination was to evaluate the County's compliance with: State policies and procedures incorporated through the contracting process and Preferred Practice Guidelines. During the examination, the review teams evaluated: the reliability and integrity of the County's data and its compliance with established programmatic and operational objectives. Additionally, the review included an examination, through sampling, of the County's efficient and appropriate use of financial resources.

Any program or operational inadequacies are identified in this report as non-compliance issues. The chart on the following page provides a quick reference to locate any non-compliance issues identified by the monitoring team. A detailed description of the issues can be found in the body of this report.

Summary of Findings

Programs Reviewed	Level of Non-Compliance Issues	Number of Findings	Page(s)
<i>Governance and Oversight</i>	Major Non-Compliance Significant Non-Compliance Minor Non-Compliance	None None 1	10 - 11
<i>Substance Abuse Prevention</i>	Major Non-Compliance Significant Non-Compliance Minor Non-Compliance	None None 1	12
<i>Substance Abuse Treatment</i>	Major Non-Compliance Significant Non-Compliance Minor Non-Compliance	None None None	

Governance and Fiscal Oversight

The Division of Substance Abuse and Mental Health (DSAMH) conducted its annual monitoring review at Utah County's Department of Drug and Alcohol Prevention and Treatment (UCaDDAPT). The Governance and Fiscal Oversight section of the review was conducted by Chad Carter, Auditor IV on January 7th, 2015. Overall cost per client data was analyzed and compared to the statewide Local Authority average, personnel and subcontractor files were examined for adherence to contractual requirements, as well as the County's own policy. Detailed service, operating and travel expenditures were examined for proper approval and supporting documentation for the months of March and April of 2014. All selected expenditures were found to be properly approved and were supported with adequate documentation.

The CPA firm Gilbert & Stewart performed an independent audit of Utah County for the year ending December 31, 2012. The Independent Auditors' Report issued on July 28, 2014 stated that there were no findings identified during the audit and issued an unqualified opinion.

Follow-up from Fiscal Year 2014 Audit:

FY14 Minor Non-compliance Issues:

- 1) Two of the reviewed subcontractor files included outdated and expired insurance documentation.

This issue has been resolved.

- 2) UCaDDAPT's cost per client is outside of Division Directive standards. DSAMH Division Directives state, "The Local Authority shall meet an overall client cost within fifty (50) percent of the statewide Local Authority overall average cost per client and with-in twenty-five (25) percent of their previous year actual cost per client." UCaDDAPT's FY13 cost per client is 127.3% more than the statewide average and 49.4% more than their previous year. The problem appears to be more of a data issue as their reported client counts are very low, negatively affecting their cost per client average.

This finding has not been resolved and is continued in FY15; see Minor Non-compliance Issue #1.

Findings for Fiscal Year 2015 Audit:

FY15 Major Non-compliance Issues:

None

FY15 Significant Non-compliance Issues:

None

FY15 Minor Non-compliance Issues:

- 1) UCADDAPT's FY14 cost per client is outside of Division Directive standards. DSAMH Division Directives state, "The Local Authority shall meet an overall client cost within fifty (50) percent of the statewide Local Authority overall average cost per client and with-in twenty-five (25) percent of their previous year actual cost per client." UCADDAPT's FY14 cost per client is 152.1% more than the statewide average. It appears that there is still a data issue as there are significant differences between the client numbers reported in UCADDAPT's year-end reports and the client numbers reported in the Substance Abuse Mental Health Information System (SAMHIS) database. UCADDAPT is responsible for reporting accurate client numbers on a monthly basis in the SAMHIS system; this data is also available for review at any time and should be used to reconcile other sources of data throughout the year. DSAMH can provide technical assistance with this issue.

Center's Response and Corrective Action Plan:

UCADDAPT has struggled with this issue for several years and has made concerted efforts to improve data reporting accuracy to little avail. Our solution to this issue is to replace our current EHR with a new one. The Go Live date for implementation of the new EHR is July 1 of this year. This will give us much more control over how data is collected and submitted and should improve our compliance with this standard.

FY15 Deficiencies:

None

FY15 Recommendations:

None

Substance Abuse Prevention

Susannah Burt, Program Manager, conducted the annual prevention review Utah County Department of Drug and Alcohol Prevention and Treatment on January 7th, 2015. The reviews focused on the requirements found in State and Federal law, Division Directives and contracts. In addition, the reviews evaluated the services described in the annual prevention area plan and evaluated the data used to establish prevention priorities.

Follow-up from Fiscal Year 2014 Audit

No findings were issued in FY14.

Findings for Fiscal Year 2015 Audit

FY15 Major Non-compliance Issues:

None

FY15 Significant Non-compliance Issues:

None

FY15 Minor Non-compliance Issues:

- 1) UCaDDAPT spent 25% of the SAPT Block Grant on prevention. This is short of the 30% contracted amount.

Center's Response and Corrective Action Plan:

27.5% of block grant funds spent on prevention was the target for this current fiscal year was agreed upon with Brent Kelsey and Craig Povey. We are working to comply with that.

FY15 Deficiencies:

- 1) In FY14, UCaDDAPT saw a decrease in the number of Eliminating Alcohol Sales to Youth (EASY) compliance checks. In FY13, Utah County completed 546 checks. In FY14, 463 checks were completed with 92.70% compliance.

FY15 Recommendations:

- 1) It is recommended that UCaDDAPT increase collaboration between Substance Abuse Treatment, Prevention and Wasatch Mental Health (Mental Illness Prevention).
- 2) It is recommended that UCaDDAPT establish additional coalitions in the County, Spanish Fork and American Fork were previously prioritized.

- 3) It is recommended that UCADDAPT add observations to their monitoring of contracted providers at least once a year.

FY15 Division Comments:

- 1) UCADDAPT is in the process of a full county level assessment.
- 2) UCADDAPT reports that they currently engage with five coalitions within the county: Eagle Mountain/Saratoga Springs, Payson, Springville, Provo (starting), and SMART Coalition. They do some collaboration with Intermountain Healthcare (IHC) coalitions and Safe Kids coalition.
- 3) Even with the decrease in EASY compliance checks, the program has fostered great relationships between UCADDAPT, communities and law enforcement.
- 4) UCADDAPT has provided technical assistance (TA) to all coalitions.
- 5) UCADDAPT has prioritized Spanish Fork and American Fork as communities they would like to see additional coalitions in. See recommendation above.
- 6) UCADDAPT continues to work on building infrastructure that is sustainable in the County. This includes building capacity by providing training on Guiding Good Choices, Strategic Prevention Framework, Substance Abuse Prevention Specialist Training and completing readiness surveys.
- 7) UCADDAPT found the Drug Free Community Grant trainings to be exceptionally helpful in strategic planning.

Substance Abuse Treatment

Dave Felt, Program Administrator, and Becky King, Programs Manager, conducted the review of Utah County Department of Drug and Alcohol Prevention and Treatment on January 7th, 2015. The site visit focused on compliance with Division Directives, clinical practices, consumer satisfaction, and performance on outcome measures. Block Grant and Division Directives compliance were evaluated through a review of program policies and guidelines; and discussions with staff members. Consumer satisfaction was evaluated through interviews with clients in services, tours of the physical facilities, and by reviewing Consumer Satisfaction Survey results. Program outcome measures were evaluated by reviewing the outcome measures against DSAMH standards. Clinical practices were evaluated by reviewing client charts.

Follow-up from Fiscal Year 2014 Audit

FY14 Minor Non-compliance Issues:

- 1) The FY13 Utah Substance Abuse Treatment Outcomes Measures Scorecard reflects that from FY12 to FY13, the percent of clients completing a treatment episode successfully decreased from 53.1% to 45.7% respectively. In FY14, the percent of clients completing a treatment episode increased to 55.8%, which now meets Division Guidelines.

This issue has been resolved.

Findings for Fiscal Year 2015 Audit

FY15 Major Non-compliance Issues:

None

FY15 Significant Non-compliance Issues:

None

FY15 Minor Non-compliance Issues:

None

FY15 Deficiencies:

- 1) UCADDAPT does not have a Drug Court Sanction Matrix, which is required by Division Directives. It is recommended that UCADDAPT develop a Drug Court Sanction Matrix which has consistent, equitable and fair sanctions. All Drug Court clients should be provided with a copy of the Drug Court Sanction Matrix.

FY15 Recommendations:

- 1) UCADDAPT continues to improve their clinical records and is moving their electronic charting system from Junction to Credible on July 1st. UCADDAPT should use the chart as a clinical tool and continue refining charting areas, such as the treatment plan objectives and

group notes. For example, objectives should be measurable, time limited and achievable. Group notes should be individualized, tied to the goals and include a clinical observation from the therapist regarding the client's progress or lack of progress in treatment (*Chart #JC9104*).

- 2) UCaDDAPT has contracted out their youth treatment to two local contract providers. There has been a lack of communication between UCaDDAPT and Wasatch County Family Clinic, which has resulted in minimal collaboration between their programs on youth services. It is recommended that UCaDDAPT work on improving communication with Wasatch County Family Clinic and collaborate more closely with them to increase youth services. For example, UCaDDAPT may want to consider co-facilitating a youth SUD/MH group or participating in joint staff meetings with Wasatch County Family Clinic.
- 3) Feedback from clients engaged in UCaDDAPT's Phase I Early Intervention indicated that they were eager for more intensive services during this phase. It is recommended that UCaDDAPT evaluate the practicality of providing more structured work for those who are ready for the increased intensity.

FY15 Division Comments:

- 1) *Data:* Over the past year, UCaDDAPT improved all of their data issues; including the number of old open cases, which is now 0.6%. They have implemented procedures to correct data issues and weekly quality assurance meetings to problem solve. UCaDDAPT has demonstrated a dedication to improving data issues, which has resulted in improved outcome measure results.
- 2) *Veterans Court:* UCaDDAPT began a Veterans Court on 1/12/15, which should expand "alternatives to incarceration" in their local area. This is one of the many initiatives that UCaDDAPT has been involved with over the past year to increase services for individuals in their local area.
- 3) *Medication Assisted Treatment (MAT):* UCaDDAPT just finished their Vivitrol trial in the Jail, which was successful. They are now planning to use Vivitrol in Treatment, which they hope will be equally successful. UCaDDAPT continues to demonstrate their dedication to the use of MAT in their program.
- 4) *Alcohol Policy Summit:* UCaDDAPT hosted their second Alcohol Policy Summit, which included groups such as the Center for Disease Control (CDC), World Health Organization (WHO), Utah State Legislature and various other organizations. The group addressed state and national alcohol policies, which demonstrated that Utah has effective alcohol policies and treatment systems.
- 5) *Treatment:* UCaDDAPT had excellent results over the past year with their Phase I, Early Treatment Group and found that people that attended this group were dropping out of treatment less frequently. UCaDDAPT has now expanded this group to other areas in Utah County, which continues to produce great results.

Signature Page

We appreciate the cooperation afforded the Division monitoring teams by the management, staff and other affiliated personnel of Utah County's Department of Drug and Alcohol Prevention and Treatment for the professional manner in which they participated in this review.

If there are any questions regarding this report please contact Chad Carter at (801) 538-4072.

The Division of Substance Abuse and Mental Health

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