



# County of San Diego

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**LUKE BERGMANN, Ph.D.**  
DIRECTOR, BEHAVIORAL HEALTH SERVICES

March 20, 2020

Dear Behavioral Health Services Providers,

## **Information for Behavioral Health Services Providers Related to Coronavirus Disease 2019 (COVID-19): Financial Practices and Contract Management Updates**

On behalf of County of San Diego Behavioral Health Services (BHS), we are reaching out to share important information with our provider community related to Coronavirus Disease 2019 (COVID-19).

Due to the current conditions related to COVID-19, BHS recognizes the difficulty that our contractors are experiencing in maintaining normal operations. Our primary goals continue to be preserving the local service delivery network and behavioral health workforce to ensure that individuals with mental health and substance use needs remain connected to ongoing care. Though the current situation remains very fluid, BHS will continue making efforts to address the financial and operational impacts of COVID-19 as well as contract and regulatory compliance; below is guidance related to these areas.

### **Maintaining Continuity of Contracted Services**

BHS contractors must continue to seek to perform in accordance with their contract's terms and remain operational to ensure essential services continue to vulnerable populations. Contractors encountering issues with maintaining continuity of operations should contact their Contracting Officer's Representative (COR) immediately. Contractors must also continue to enter client data into the appropriate data systems, including CCHB and SanWITs.

### **Establishing a COVID-19 Cost Center**

To ensure contractors are able to delineate expenses related to COVID-19 staffing resources, services, supplies and other expenses from costs for normal operations, contractors should establish a COVID-19 cost center. Contractors will be required to invoice the County for normal and COVID-19-related costs in support of BHS services through the normal invoicing process.

**Billable time** must be tracked and invoiced through the normal cost centers and should include staff time utilized in providing billable services via alternate service delivery methods such as telehealth or others.

Contractors must capture the following expenses related to **COVID-19 activities** in support of contracted services:

#### **A. Salaries and Benefits (S&B)**

- Non-billable time for employees providing COVID-19 support, including administrative activities, planning, coordination and response related to COVID-19.

**B. Services & Supplies (S&S):**

- Personal protective equipment (PPE), hand sanitizer, cleaning products, etc.
- Additional cleaning services.
- Information technology, including laptops, headsets, monitors, etc.
- Other services, supplies and equipment in support of maintaining continuity of operations for services.

**How to Create a COVID-19 Cost Center**

To create a new COVID-19 cost center, please follow the following instructions, based on the type of contract:

- **Mental Health (MH)** – Add a cost center in *Schedule I MH & SUD* tab.
- **Substance Use Disorder (SUD)** – Add a cost center in *Schedule I, Schedule IIA and SUD Invoice Summary* tab.

**Contractors may adjust line items but must stay within their maximum contract budget.** This notice serves as budget approval, therefore administrative adjustment requests (AARs) and budget adjustments are not required.

**Tracking Other Non-Invoiceable COVID-19 Expenses**

Although at this time there is no known mechanism for reimbursement, the County continues to monitor evolving federal and State guidance regarding funding developments and will provide updates as more information is received. Contractors are encouraged to track all other COVID-19 expenses for future reference, including but not limited to, salary and benefit costs for employees who have exhausted all vacation/sick leave balances and are unable to work for the following reasons:

- Employee illness or self-quarantine related to COVID-19
- Employee has increased vulnerability (e.g., 65+ years of age)
- Employee is caring for a family member within an increased vulnerability population (e.g., 65+ years of age)
- Employee is experiencing childcare issues

Contractors should review internal benefit plans, policies, and procedures to support staff who may need to stay home during this time.

**Modification of Contract Monitoring Processes**

Effective immediately, the County will modify monitoring requirements due to operational changes resulting from COVID-19.

**A) Statement of Work (SOW) Monitoring**

COR site visits scheduled in March 2020 will be cancelled. Further direction may follow for those planned in April 2020. Additionally, BHS will temporarily suspend the following contractual requirements until further notice:

- Fiscal Year 2019-20 Drug Medi-Cal (DMC) – Organized Delivery System (ODS) unit production
- Fiscal Year 2019-20 Mental Health (MH) unit production
- Additional items as approved by the COR

**B) Audit and In-Depth Invoice Review Monitoring**

In-depth invoice reviews (IIRs) for BHS contracts will be temporarily suspended until further notice. Additionally, Agency Contract Support (ACS) contractor audits or follow-up will be suspended until further notice if contractor interaction is required.

**Additional Resources**

County of San Diego COVID-19 website: <https://www.sandiegocounty.gov/coronavirus.html>.

Department of Purchasing and Contracting: Information for Individuals and Entities Who Contract with the County San Diego: [https://www.sandiegocounty.gov/content/dam/sdc/purchasing/docs/CoSD\\_DPC\\_COVID-19\\_letter\\_to\\_contractors.pdf](https://www.sandiegocounty.gov/content/dam/sdc/purchasing/docs/CoSD_DPC_COVID-19_letter_to_contractors.pdf).

Thank you for your continued commitment to providing quality behavioral health care in this rapidly changing environment. BHS is committed to sharing regular communication with our contracted service providers as this situation unfolds. Please do not hesitate to reach out to your COR with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'LUKE BERGMANN', with a stylized flourish extending to the right.

LUKE BERGMANN, Ph.D., Director  
Behavioral Health Services