



INTERIM INSTRUCTION NOTICE #20-001

July 1, 2020

SUBJECT: Network Adequacy Certification Tool

DISTRIBUTION: All Department of Behavioral Health Staff, Contract Agencies and Fee for Service Providers

OBSOLETE: Upon completion of related policy and/or procedure

Effective Date July 1, 2020

From DBH Program Support Services

Introduction The purpose of this Interim Instruction Notice is to inform San Bernardino County (County) Department of Behavioral Health (DBH) staff, contract agencies and Fee for Service (FFS) providers of changes to the submission of the Network Adequacy Certification Tool (NACT).

Mental Health (MH) NACT Effective April 1, 2020, the Department of Health Care Services (DHCS) issued Behavioral Health Information Notice No. [20-012](#), changing the submission requirements for the Mental Health (MH) NACT. DBH is now required to submit the NACT and supporting documentation as follows:

- Fiscal Year (FY) 2019/2020: Due to DHCS by April 1 for the reporting period of December 1, 2019 – February 29, 2020
- FY 2020/2021: Due to DHCS by April 1 for the reporting period of December 1, 2020 – February 28, 2021

Note: Not all DBH MH programs, County or contracted, are reportable on the NACT. Typically, outpatient services are reported and the following types of providers are exempt from NACT reporting:

- Residential providers,
- Non Medi-Cal billing programs,
- Out-of-county programs, and
- Hospital providers.

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NACT Provider Directory Form

DBH previously required providers to complete the NACT Provider Directory on a monthly basis in order to capture necessary information for the NACT and provider directory. DBH has revised the Provider Directory Form so that it will capture only the provider directory information on a monthly basis, since there is no longer a requirement for DBH to submit the NACT quarterly to DHCS.

Monitoring Network Capacity

Regulations applicable to County Mental Health Plans (MHP) require DBH to assess the capacity of service delivery for its clients, which includes monitoring the number, type and geographic distribution of mental health services within the MHP's delivery system. As the MHP for the County, DBH will complete the following steps in order to comply with outlined requirements:

1. DBH will send contract agencies, FFS providers and DBH clinics their NACT information requesting updates on a quarterly basis as follows:
 - Issue no later than Dec 1 and require return by Dec 31;
 - Issue no later than March 1 and require return by March 31;
 - Issue no later than June 1 and require return by June 30; and
 - Issue no later than September 1 and require return by September 30.
 2. Review rendering provider and clinic information provided by contract agencies, FFS providers and DBH clinics to determine if updates are necessary, and if so, make changes within 20-25 days following submission.
 3. Analyze and determine NACT provider counts within 1-2 days from the date all updates are made.
 4. Complete analysis regarding provider ratios and confirm numbers no later than 1 month following submission from the contract agencies, FFS providers and DBH clinics.
 5. Within 2 weeks of analysis, notify DBH Leadership of DBH's provider ratios so action can be taken, if needed.
 6. Provide NACT update to DBH clinics, contract agencies and FFS providers.
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Questions

For questions regarding this Interim Instruction Notice, please contact DBH Program Support Services at 909-388-0898 or DBH-NACT@dbh.sbcounty.gov.
