



July 24, 2023

THIS LETTER SENT VIA EMAIL TO: ranell.brown@co.del-norte.ca.us

Ranell Brown, Director
Del Norte County Health and Human Services
455 K Street
Crescent City, CA 95531

SUBJECT: ANNUAL COUNTY COMPLIANCE SECTION DMC FINDINGS REPORT

Dear Director Brown:

The Department of Health Care Services (DHCS) is responsible for monitoring compliance to requirements of the Drug Medi-Cal (DMC) Contract operated by Del Norte County.

The County Compliance Section (CCS) within Audits and Investigations (A&I) of DHCS conducted a review of the County's compliance with contract requirements based on responses to the monitoring protocol, discussion with County staff, and supporting documentation provided by the County. Enclosed are the results of Del Norte County's Fiscal Year (FY) 2022-23 DMC compliance review. The report identifies deficiencies, required corrective actions, advisory recommendations, and referrals for technical assistance.

Del Norte County is required to submit a Corrective Action Plan (CAP) addressing each compliance deficiency (CD) to the Medi-Cal Behavioral Health – Oversight and Monitoring Division (MCBH-OMD), County/Provider Operations and Monitoring Branch (CPOMB) Liaison by 9/25/2023. Please use the enclosed CAP form to submit the completed CAP and supporting documentation via the MOVEit Secure Managed File Transfer System. For instructions on how to submit to the correct MOVEit folder, email MCBHOmdMonitoring@dhcs.ca.gov.

If you have any questions, please contact me at emanuel.hernandez@dhcs.ca.gov.

Sincerely,

Emanuel Hernandez | County Compliance Monitoring II Analyst

Distribution:

To: Director Brown,

Cc: Mateo Hernandez, Audits and Investigations, Contract and Enrollment Review
Division Chief
Catherine Hicks, Audits and Investigations, Behavioral Health Compliance
Branch Chief
Ayesha Smith, Audits and Investigations, County Compliance Section Chief
Michael Bivians, Audits and Investigations, County Compliance Monitoring II
Chief
Cindy Berger, Audits and Investigations, Provider Compliance Section Chief
Sergio Lopez, County/Provider Operations and Monitoring Section I Chief
Tony Nguyen, County/Provider Operations and Monitoring Section II Chief
MCBHOMDMonitoring@dhcs.ca.gov, County/Provider Operations and
Monitoring Branch
Samantha Reagen, Del Norte County Staff Services Manager

COUNTY REVIEW INFORMATION

County:

Del Norte

County Contact Name/Title:

Samantha Reagan, Staff Services Manager

County Address:

455 K Street
Crescent City, CA 95531

County Phone Number/Email:

(707) 464-7224 x 2558
Samantha.reagan@co.del-norte.ca.us

Date of Review:

5/25/2023

Lead CCM Analyst:

Emanuel Hernandez

Assisting CCM Analyst:

N/A

Report Prepared by:

Emanuel Hernandez

Report Approved by:

Ayesha Smith

REVIEW SCOPE

- I. Regulations:
 - a. California Code of Regulations, Title 22, section 51341.1, 51490.1 and 51516.1 – Drug Medi-Cal Substance Use Disorder Services
 - b. California Code of Regulations, Title 9, Division 4: Department of Alcohol and Drug Programs
 - c. Health and Safety Code, Division 10.5, Section 11750 – 11970: Alcohol and Drug Programs
 - d. Welfare and Institutions Code, Division 9, Part 3, Chapter 7, Sections 14000, et seq.; 14100.2, 14021, 14021.51-14021.53, 14021.6, and 14124.20-14124.25, 14184.402, 14059.5: Basic Health Care – Drug Medi-Cal Treatment Program

- II. Program Requirements:
 - a. Fiscal Year (FY) 2021-22 State-County Contract, herein referred to as State County Contract
 - b. Fiscal Year (FY) 2022-23 State-County Contract, herein referred to as State County Contract
 - c. Mental Health and Substance Use Disorders Services (MHSUDS) Information Notices
 - d. Behavioral Health Information Notices (BHIN)

ENTRANCE AND EXIT CONFERENCE SUMMARIES

Entrance Conference:

An Entrance Conference was conducted via WebEx on 5/25/2023. The following individuals were present:

- Representing DHCS:
Emanuel Hernandez, County Compliance Monitoring II (CCM II) Analyst
- Representing Del Norte County:
Shiann Hogan, Behavioral Health Program Manager
Samantha Reagan, Staff Services Manager
Carrie Fowles, Staff Services Analyst I
Naoma Workman, Behavioral Health Program Coordinator
Malinda Hamilton, Behavioral Health, Administrative Analyst
Shirley Cha, Behavioral Health, Fiscal Manager
Alex Garcia, Behavioral Health, Prevention Program Coordinator

During the Entrance Conference, the following topics were discussed:

- Introductions
- DHCS overview of review process
- Del Norte County overview of services provided

Exit Conference:

An Exit Conference was conducted via WebEx on 5/25/2023. The following individuals were present:

- Representing DHCS:
Emanuel Hernandez, CCM II Analyst

- Representing Del Norte County:
Shiann Hogan, Behavioral Health Program Manager
Samantha Reagan, Staff Services Manager
Carrie Fowles, Staff Services Analyst I
Naoma Workman, Behavioral Health Program Coordinator
Malinda Hamilton, Behavioral Health, Administrative Analyst
Shirley Cha, Behavioral Health, Fiscal Manager
Alex Garcia, Behavioral Health, Prevention Program Coordinator

During the Exit Conference, the following topics were discussed:

- Submitting follow-up evidence
- Due date for evidence submission

SUMMARY OF FY 2022-23 COMPLIANCE DEFICIENCIES (CD)

<u>Section</u>	<u>Number of CDs</u>
1.0 Administration	0
2.0 Program Integrity	1
3.0 Perinatal Practice Guidelines	0
4.0 Youth Services	0
5.0 Reporting Requirements	0

Category 2: PROGRAM INTEGRITY

A review of the County's program integrity was conducted to ensure compliance with applicable regulations, and standards. The following DMC deficiency in regulations, standards, or protocol requirements was identified:

COMPLIANCE DEFICIENCY:

CD 2.1:

DMC Contract, Exhibit A, Attachment IA 1, Part III, B

The Contractor and subcontractors that provide DMC services shall be responsible for verifying the Medi-Cal eligibility of each beneficiary for each month of service prior to billing for DMC services to that beneficiary for that month. Medi-Cal eligibility verification shall be performed prior to rendering service, in accordance with and as described in DHCS' DMC Provider Billing Manual. Options for verifying the eligibility of a Medi-Cal beneficiary are described in the DHCS' DMC Provider Billing Manual.

Findings: The County did not provide evidence of compliance demonstrating that Medi-Cal eligibility verification is:

- Performed monthly.
- Performed prior to rendering service.
- Performed at both the County and subcontractor level, if applicable.

TECHNICAL ASSISTANCE

Del Norte County did not request technical assistance.