

July 14, 2025

THIS LETTER SENT VIA EMAIL TO: EckertK@co.monterey.ca.us

Kathryn Eckert, Behavioral Health Director
Monterey County Behavioral Health
1270 Natividad Rd. Ste 107-108
Monterey, CA 93906

SUBJECT: ANNUAL DRUG MEDI-CAL ORGANIZED DELIVERY SYSTEM
FINDINGS REPORT

Dear Director Eckert:

The Department of Health Care Services (DHCS) is responsible for determining compliance to the requirements of the Drug Medi-Cal Organized Delivery System (DMC-ODS) Intergovernmental Agreement operated by Monterey County.

The Substance Use Disorder Review Section (SUDRS) within DHCS' Audits and Investigations' Contract and Enrollment Review Division (CERD) conducted a review of the County's compliance with Federal and State laws, Medi-Cal regulations, program requirements and the State's DMC-ODS contract. The review included an inspection of the County's policies for providing services, procedures to implement these policies, and the process to determine whether these policies were effective. Documents were reviewed and interviews were conducted with County staff. Enclosed are the results of Monterey County's Fiscal Year (FY) 2024-25 DMC-ODS compliance review. The report identifies compliance review findings and referrals for technical assistance.

Monterey County is required to submit a Corrective Action Plan (CAP) addressing each review finding noted to DHCS' Behavioral Health – Oversight and Monitoring Division (BH-OMD), County Compliance and Monitoring Section (CCMS). For questions regarding the CAP process and submitting documentation, email your questions to BHOMDMonitoring@dhcs.ca.gov. If you have any questions regarding the review process, please contact me at emanuel.hernandez@dhcs.ca.gov.

Sincerely,



Emanuel Hernandez | Analyst

Distribution:

To: Director Eckert

CC: Mateo Hernandez, PhD, Assistant Deputy Director
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BHOMDMonitoring@dhcs.ca.gov, Behavioral Health County Support and
Operations Branch

Rachel Amerault Monterey County Behavioral Health Services (MCBHS)
Manager II

Janet Barajas, MCBHS Quality Improvement (QI) Manager II

COUNTY REVIEW INFORMATION

County:

Monterey

County Contact Name/Title:

Rachel Amerault MCBHS Manager II/AOD Administrator, SUD Team
Janet Barajas, MCBHS Quality Improvement (QI) Manager II

County Address:

1611 Bunker Hill Way, Suite 120
Salinas, CA 93906

County Phone Number/Email:

831-258-8411/831-755-4545
AmeraultRE@countyofmonterey.gov/BarajasJH@co.monterey.ca.gov

Date of DMC-ODS Implementation:

07/01/2018

Date of Review:

4/2/2025

Lead SUDRS Reviewer:

Emanuel Hernandez

Assisting SUDRS Reviewer:

N/A

Report Prepared by:

Emanuel Hernandez

Report Approved by:

Michael Bivians

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) 2023-24 DMC-ODS Intergovernmental Agreement (IA)
- b. State of California *Adolescent Best Practices Guidelines October 2020*
- c. DHCS' *Perinatal Practice Guidelines FY 2018-19*
- d. DHCS' *Minimum Quality Drug Treatment Standards (Document 2F(a))*
- e. National Culturally and Linguistically Appropriate Services (CLAS)
- f. Mental Health and Substance Use Disorders Services (MHSUDS) Information Notices
- g. Behavioral Health Information Notices (BHIN)

ENTRANCE AND EXIT CONFERENCE SUMMARIES

Entrance Conference:

An Entrance Conference was conducted via Teams on 4/2/2025. The following individuals were present:

- Representing DHCS:
Emanuel Hernandez, Analyst, SUDRS Unit 2
Jonette La Rue, Chief, SUDRS Unit 2
Caitlin Martinez, Chief, Behavioral Health Services Act (BHSA) Program Compliance and Monitoring Unit 2
Angela Rankin, County Liaison, BHSA Program Compliance and Monitoring Unit 2
Nikeeta Casado, County Liaison, CCMS Unit 1
- Representing Monterey County:
Rachel Amerault, Service Manager II/AOD Administrator, SUD Team
Janet Barajas, QI Manager II
Uribe Ortega, Management Analyst II, QI
Melanie Rhodes, Behavioral Health Director
Fabricio Chambo, Assistant Bureau Chief
Rosary Moreno, Management Analyst III
Nick Cronkhite, Finance Manager II
Elizabeth Cardona, Accountant III
Ruben Gabriel, Unit Supervisor, QI
Bernie Clavo, Finance Manager I
Nancy Mendoza, Senior Psychiatric Social Worker, QI
Kimberly Gray, Senior Psychiatric Social Worker, QI
LeAnn Jones, Unit Supervisor, QI
Phoebe Young, Senior Psychiatric Social Worker, QI
Katie Martinez, Senior Psychiatric Social Worker, QI
Maria Gallardo Gonzalez, Senior Psychiatric Social Worker, SUD Team
Jessica Jarrett, Senior Psychiatric Social Worker, QI

During the Entrance Conference, the following topics were discussed:

- Introductions
- DHCS overview of review process
- Monterey County overview of services provided

Exit Conference:

An Exit Conference was conducted via Teams on 4/4/2025. The following individuals were present:

- Representing DHCS:
Emanuel Hernandez, Analyst, SUDRS Unit 2
Jonette La Rue, Chief, SUDRS Unit 2
Caitlin Martinez, Chief, BHSA Program Compliance and Monitoring Unit 2
Angela Rankin, County Liaison, BHSA Program Compliance and Monitoring Unit 2
Nikeeta Casado, County Liaison, CCMS Unit 1
- Representing Monterey County:
Rachel Amerault, Service Manager II/AOD Administrator, SUD Team
Janet Barajas, QI Manager II
Uribe Ortega, Management Analyst II, QI
Melanie Rhodes, Behavioral Health Director
Fabricio Chambo, Assistant Bureau Chief
Rosary Moreno, Management Analyst III
Nick Cronkhite, Finance Manager II
Elizabeth Cardona, Accountant III
Ruben Gabriel, Unit Supervisor, QI
Bernie Clavo, Finance Manager I
Nancy Mendoza, Senior Psychiatric Social Worker, QI
Kimberly Gray, Senior Psychiatric Social Worker, QI
LeAnn Jones, Unit Supervisor, QI
Phoebe Young, Senior Psychiatric Social Worker, QI
Katie Martinez, Senior Psychiatric Social Worker, QI
Maria Gallardo Gonzalez, Senior Psychiatric Social Worker, SUD Team
Jessica Jarrett, Senior Psychiatric Social Worker, QI

During the Exit Conference, the following topics were discussed:

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

SUMMARY OF FY 2024-25 COMPLIANCE FINDINGS

<u>Category</u>	<u>Number of Findings</u>
1.0 Availability of DMC-ODS Services	2
2.0 Care Coordination	0
3.0 Quality Assurance and Performance Improvement	0
4.0 Access and Information Requirements	1
5.0 Coverage and Authorization of Services	0
6.0 Beneficiary Rights and Protections	0
7.0 Program Integrity	0

CORRECTIVE ACTION PLAN (CAP)

Pursuant to the Intergovernmental Agreement, Exhibit A, Attachment I, Part III, Section QQ each CD identified must be addressed via a CAP.

Your CCMS liaison manages the progress of CAP completion.

For questions regarding the CAP form and instructions on how to complete the FY 2024-25 CAP, please email BHOMDMonitoring@dhcs.ca.gov.

Category 1: AVAILABILITY OF DMC-ODS SERVICES

A review of the County's records, service providers, referrals, services, contracts, and general provisions was conducted to ensure compliance with applicable federal and state laws, Medi-Cal regulations, program requirements and the State's DMC-ODS contract. The following findings were identified:

COMPLIANCE FINDINGS:

1.1.4:

Exhibit A Attachment I, Section III Program Specifications, G, 3, x

- x. Require that treatment programs are accessible to people with disabilities in accordance with CFR Title 45, Part 84 and the Americans with Disabilities Act.

Findings: The County did not provide evidence it requires treatment programs to be accessible to people with disabilities in accordance with Title 45 Code of Federal Regulations (CFR), Part 84 and the Americans with Disabilities Act.

1.4.22:

Exhibit A Attachment I, Section III Program Specifications, NN, 3, ii, c

- c. The Contractor shall ensure that all personnel who provide WM services or who monitor or supervise the provision of such service shall meet additional training requirements set forth in BHIN 21-001 and its accompanying exhibits.

Findings: The Plan did not provide evidence ensures subcontractor staff who provide Withdrawal Management (WM) services or, who monitor or supervise the provision of such services, meet the additional training set forth in Behavioral Health Information Notice (BHIN) 21-001, specifically:

- Certified in cardiopulmonary resuscitation.
- Certified in first aid.
- Trained in the use of Naloxone.
- Six (6) hours of orientation training for all personnel providing WM services, monitoring, and supervising the provision of WM services.
- Repeated orientation training within 14-days for returning staff following a 180 continuous day break in employment.
- Eight (8) hours of training annually that covers the needs of residents who receive WM services.
- Training documentation must be maintained in personnel records.
- Personnel training shall be implemented and maintained by the licensee pursuant to CCR, Title 9, Section 10564(k).

Category 4: ACCESS AND INFORMATION REQUIREMENTS

A review of the County's Access and Information Requirements was conducted to ensure compliance with applicable federal and state laws, Medi-Cal regulations, program requirements and the State's DMC-ODS contract. The following finding was identified:

COMPLIANCE FINDING:

4.1.9:

Exhibit A Attachment I, Section II Federal Requirements, K, 6, iii

- iii. The Contractor shall provide interpretive services and make member information available in the following alternative formats: Braille, audio format, large print (no less than 20-point font), and accessible electronic format (such as a data CD). In determining what types of auxiliary aids and services are necessary, the Contractor shall give "primary consideration" to the individual's request of a particular auxiliary aid or service.

Exhibit A Attachment I, Section II Federal Requirements, K, 6, v

- v. When providing interpretive services, the Contractor shall use qualified interpreters to interpret for an individual with a disability, whether through a remote interpreting service or an on-site appearance. A qualified interpreter for an individual with a disability is an interpreter who: 1) adheres to generally accepted interpreter ethics principals, including client confidentiality; and 2) is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary, terminology, and phraseology. For an individual with a disability, qualified interpreters can include, for example, sign language interpreters, oral transliterators (individuals who represent or spell in the characters of another alphabet), and cued language transliterators (individuals who represent or spell by using a small number of handshapes).

Findings: The County did not provide evidence demonstrating the County and subcontractors comply with the timely provision of appropriate auxiliary aids and services, free of charge, to persons with impaired sensory, manual, or speaking skills including at a minimum, the following:

- Braille documentation.

TECHNICAL ASSISTANCE

Monterey County did not request technical assistance during this review.