

May 2, 2025

THIS LETTER SENT VIA EMAIL TO: dedgull@sanbenitocountyca.gov

Dana Edgull, Behavioral Health Director
San Benito County Behavioral Health
1131 Community Parkway
Hollister, CA 95023

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

Dear Director Edgull:

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 San Benito 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 San Benito County's Fiscal Year (FY) 2024-25 DMC-ODS compliance review. The report identifies compliance review findings and referrals for technical assistance.

San Benito 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 susan.volmer@dhcs.ca.gov.

Sincerely,

Susan Volmer | Analyst

Distribution:

To: Director Dana Edgull

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BHOMDMonitoring@dhcs.ca.gov, Behavioral Health County Support and
Operations Branch

Marcus Padilla, Quality Improvement (QI) Supervisor, San Benito County
Behavioral Health

COUNTY REVIEW INFORMATION

County:

San Benito

County Contact Name/Title:

Marcus Padilla/QI Supervisor

County Address:

1131 Community Parkway
Hollister, CA 95023

County Phone Number/Email:

(831) 821-4519
mpadilla@sanbenitocountyca.gov

Date of DMC-ODS Implementation:

07/01/2019

Date of Review:

3/26/2025

Lead SUDRS Reviewer:

Susan Volmer

Assisting SUDRS Reviewer:

N/A

Report Prepared by:

Susan Volmer

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

An Entrance Conference was conducted via Teams on 3/26/2025. The following individuals were present:

- Representing DHCS:
Susan Volmer, Analyst, SUDRS Unit 2
Jonette La Rue, Chief, SUDRS Unit 2
Lelani Kwon, Chief, CCMS Unit 2
Elsie Campos, County Liaison, CCMS Unit 2
- Representing San Benito County:
Sandra Urbina, Accountant
Elizabeth Lopez, Clinical Manager
Marcus Padilla, QI Supervisor
Maxe Cendana, QI Supervisor
Dan Edgull, Behavioral Health Director
Lindsay Garfield, QI Supervisor
Rachel White, Assistant Director
Katherine Nako, QI Supervisor
Rumi Saikia, QI Supervisor

During the Entrance Conference, the following topics were discussed:

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

Exit Conference:

An Exit Conference was conducted via Teams on 3/26/2025. The following individuals were present:

- Representing DHCS:
 - Susan Volmer, Analyst, SUDRS Unit 2
 - Jonette La Rue, Chief, SUDRS Unit 2
 - Lelani Kwon, Chief, CCMS Unit 2
 - Elsie Campos, County Liaison, CCMS Unit 2
 - Caitlin Martinez, CCMS Behavioral Health Services Act (BHSA) Unit 2
 - Angela Rankin, CCMS BHSA Unit 2
- Representing San Benito County:
 - Sandra Urbina, Accountant
 - Elizabeth Lopez, Clinical Manager
 - Marcus Padilla, QI Supervisor
 - Maxe Cendana, QI Supervisor
 - Dan Edgull, Behavioral Health Director
 - Lindsay Garfield, QI Supervisor
 - Rachel White, Assistant Director
 - Katherine Nako, QI Supervisor
 - Rumi Saikia, QI Supervisor

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	0
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 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).

Finding: 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, all the following:

- Braille documentation.
- Audio formatted documentation (audio CD).
- Accessible electronic format (data CD).

TECHNICAL ASSISTANCE

San Benito County did not request technical assistance during this review.