

January 31, 2025

THIS LETTER SENT VIA EMAIL TO: gvalentine@sjcbhs.org

Genevieve Valentine, LMFT, Behavioral Health Director
San Joaquin County
1212 N. California Street
Stockton, CA 95202

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

Dear Director Valentine:

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

San Joaquin 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 | SUDRS Analyst

Distribution:

To: Director Valentine

CC: Mateo Hernandez, PhD, Assistant Deputy Director
Audits and Investigations

Brian Vu, Assistant Division Chief
Contract and Enrollment Review Division - Audits and Investigations

Catherine Hicks, Chief
Behavioral Health Review Branch
Contract and Enrollment Review Division - Audits and Investigations

Ayesha Smith, Chief
Specialty Mental Health Review Section
Contract and Enrollment Review Division - Audits and Investigations

Michael Bivians, Chief
Substance Use Disorder Review Section
Contract and Enrollment Review Division - Audits and Investigations

Christopher Purcell, Chief
Substance Use Disorder Review Unit 1
Contract and Enrollment Review Division - Audits and Investigations

Sergio Lopez, Chief
County/Provider Compliance and Monitoring Section
Behavioral Health – Oversight and Monitoring Division

Tony Nguyen, Chief
County Liaison and Operations Section
Behavioral Health – Oversight and Monitoring Division

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

Stefene Clinton LCSW, San Joaquin County Chief Mental Health Clinician

COUNTY REVIEW INFORMATION

County:

San Joaquin

County Contact Name/Title:

Stefene Clinton, LCSW Chief Mental Health Clinician

County Address:

1212 N. California Street
Stockton, CA 95202

County Phone Number/Email:

sclinton@sjcbhs.org
209-468-8481

Date of DMC-ODS Implementation:

6/29/18

Date of Review:

12/11/2024

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

Entrance Conference:

An Entrance Conference was conducted via Teams on 12/11/2024. The following individuals were present:

- Representing DHCS:
Susan Volmer, SUDRS Analyst
Jasmine Jackson-Forrest, County Medi-Cal Compliance and Monitoring Unit 2 (CMCCM2) Liaison
- Representing San Joaquin County:
Alicia Tacata, Compliance Manager
Stefenee Clinton LCSW, Chief Mental Health Clinician
Jeff Sabeau, Deputy Director
Genevieve Valentine, BHS Director
Soma Azizi, Staff Nurse III Clinical Ambulatory
Kelly Mraz, Contracts Supervisor
Jessica Wieland LPCC, Chief Mental Health Clinician
John Salwolke, Management Analyst II, Contracts
Marc Santo, Management Analyst III
Cara Dunn, Assistant Director, Administration
Joaquin Vivero, SUD Manager
Michelle Berdahl, Program Manager Recovery House
Sabrina Parker, Deputy Director, Administration
Daniel Ray, Management Analyst I
Tamar Crummett, SUS Manager
Donna Bickham, Deputy Director QAPI and Medical Records
Paul Pelletier, SUS Program Manager
Carmencita Bringas, 24-Hour Services Manager
Fay Vieira, Clinical Assistant Director
Courtney Flores, Deputy Director Children & Youth Services
Shahloh Jones-Mitchell, Management Analyst III
Olivia Roccucci, Accountant II, SUD Business Office
Cynthia Poulos, Staff Nurse V Clinical Ambulatory
Isaiah Lilly, Deputy Director HCS – Fiscal
Xuan Dinh, Account Tech II, SUD Business Office

Amanda Yocham, Children & Youth Services Prevention Contract Monitor
Nicole LeClaire-Hendricks, Management Analyst II
Betsey Pettis, Deputy Director SUS

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 12/11/2024. The following individuals were present:

- Representing DHCS:
Susan Volmer, SUDRS Analyst
- Representing San Joaquin County:
Alicia Tacata, Compliance Manager
Stefenee Clinton LCSW, Chief Mental Health Clinician
Jeff Sabeau, Deputy Director
Soma Azizi, Staff Nurse III Clinical Ambulatory
Kelly Mraz, Contracts Supervisor
Jessica Wieland LPCC, Chief Mental Health Clinician
John Salwolke, Management Analyst II, Contracts
Marc Santo, Management Analyst III
Joaquin Vivero, SUD Manager
Michelle Berdahl, Program Manager Recovery House
Sabrina Parker, Deputy Director, Administration
Daniel Ray, Management Analyst I
Tamar Crummett, SUS Manager
Donna Bickham, Deputy Director QAPI and Medical Records
Paul Pelletier, SUS Program Manager
Fay Vieira, Clinical Assistant Director
Courtney Flores, Deputy Director Children & Youth Services
Shahloh Jones-Mitchell, Management Analyst III
Olivia Roccucci, Accountant II, SUD Business Office
Cynthia Poulos, Staff Nurse V Clinical Ambulatory
Isaiah Lilly, Deputy Director HCS – Fiscal
Xuan Dinh, Account Tech II, SUD Business Office
Amanda Yocham, Children & Youth Services Prevention Contract Monitor
Nicole LeClaire-Hendricks, Management Analyst II
Betsey Pettis, Deputy Director SUS
Hope Jimenez, Health Care Services Accounting Manager

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	1

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).

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, all the following:

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

Category 7: PROGRAM INTEGRITY

A review of the County's Program Integrity 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:

7.2.1:

(Exhibit A Attachment I, Section II Federal Requirements, H, 5, ii, b)

- b. Provision for prompt reporting of all overpayments identified or recovered, specifying the overpayments due to potential fraud, to the Department.

Findings: The Plan did not provide evidence demonstrating the County complies of its provision for prompt reporting of all overpayments identified or recovered, specifying the overpayments due to potential fraud, to the Department.

TECHNICAL ASSISTANCE

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