

July 23, 2025

THIS LETTER SENT VIA EMAIL TO: [Marni.sandoval@santacruzcountyca.gov](mailto:Marni.sandoval@santacruzcountyca.gov)

Dr. Marni R. Sandoval, Behavioral Health Director  
Santa Cruz County Health Services Agency  
1400 Emeline Avenue Building K  
Santa Cruz, CA 95060

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

Dear Dr. Sandoval:

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

Santa Cruz 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](mailto:BHOMDMonitoring@dhcs.ca.gov). If you have any questions regarding the review process, please contact me at [emanuel.hernandez@dhcs.ca.gov](mailto:emanuel.hernandez@dhcs.ca.gov).

Sincerely,



Emanuel Hernandez | Analyst

Distribution:

To: Dr. Sandoval,

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

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[BHOMDMonitoring@dhcs.ca.gov](mailto:BHOMDMonitoring@dhcs.ca.gov), Behavioral Health County Support and  
Operations Branch

Casey Swank, LCSW, Substance Use Disorder (SUD) Service Director, Santa  
Cruz County Health Services Agency (SCCHSA)

Subé Robertson, Quality Improvement (QI) Director, Santa Cruz County Health  
Services Agency (SCCHSA),

## COUNTY REVIEW INFORMATION

**County:**

Santa Cruz

**County Contact Name/Title:**

Subé Robertson, QI Director

**County Address:**

1400 Emeline Avenue Building K  
Santa Cruz, CA 95060

**County Phone Number/Email:**

(831) 454-4959  
sube.robertson@santacruzcountyca.gov

**Date of DMC-ODS Implementation:**

1/01/2018

**Date of Review:**

5/20/2025

**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 5/20/2025. The following individuals were present:

- Representing DHCS:  
Emanuel Hernandez, Analyst, SUDRS Unit 2  
Jonette La Rue, Chief, SUDRS Unit 2  
David Cannedy, Chief, CCMS Unit 1  
Mary Westmark, County Liaison CCMS Unit 1
  
- Representing Santa Cruz County:  
Subé Robertson, QI Director  
Casey Swank, LCSW, SUD Director  
Leah Flagg Wilson, QI Program Manager  
Beloved Bolton, Utilization Review Specialist  
Madea Owen, Utilization Review Specialist  
Shelly Barker, QI Program Manager  
Karen Kern, Behavioral Health (BH) Deputy Director  
Diana Zuniga, Utilization Review Specialist  
Daniel Crews, Health Information Services Manager  
Nicole Campbell, Senior Department Administration Analyst  
Amanda Crowder, SUD Program Manager  
Nancy Weitzel, Department Administrative Analyst

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 5/20/2025. The following individuals were present:

- Representing DHCS:  
Emanuel Hernandez, Analyst, SUDRS Unit 2  
Jonette La Rue, Chief, SUDRS Unit 2  
David Cannedy, Chief, CCMS Unit 1  
Mary Westmark, County Liaison, BH-OMD Unit 1
- Representing Santa Cruz County:  
Subé Robertson, QI Director  
Casey Swank, LCSW, SUD Director  
Leah Flagg Wilson, QI Program Manager  
Beloved Bolton, Utilization Review Specialist  
Madea Owen, Utilization Review Specialist  
Shelly Barker, QI Program Manager  
Karen Kern, BH Deputy Director  
Diana Zuniga, Utilization Review Specialist  
Daniel Crews, Health Information Services Manager  
Nicole Campbell, Senior Department Administrative Analyst  
Amanda Crowder, SUD Program Manager  
Nancy Weitzel, Department Administrative Analyst

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

<b><u>Category</u></b>	<b><u>Number of Findings</u></b>
1.0 Availability of DMC-ODS Services	1
2.0 Care Coordination	0
3.0 Quality Assurance and Performance Improvement	0
4.0 Access and Information Requirements	0
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](mailto: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 finding was identified:

### COMPLIANCE FINDING:

#### **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 that ensures County and 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 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 with its provision for prompt reporting of all overpayments identified or recovered, specifying the overpayments due to potential fraud, to the Department.

## **TECHNICAL ASSISTANCE**

Santa Cruz County did not request technical assistance during this review