

**DHCS REPORT ON THE SUBSTANCE USE
DISORDER (SUD) AUDIT OF:
AMADOR COUNTY BEHAVIORAL HEALTH
PLAN
2023**



DEPARTMENT OF HEALTH CARE SERVICES
AUDITS AND INVESTIGATIONS
CONTRACT AND ENROLLMENT REVIEW DIVISION
BEHAVIORAL HEALTH REVIEW BRANCH

REPORT ON THE SUBSTANCE USE DISORDER (SUD) AUDIT OF

Amador County Drug Medi-Cal Services

2023

Contract Number: 20-10170
Drug Medi-Cal Services (DMC)

Audit Period: July 1, 2022
through
June 30, 2023

Dates of Audit: April 2, 2024
through
April 12, 2024

Report Issued: September 10, 2024

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I. INTRODUCTION

Amador County Behavioral Health Services (Plan) provides a variety of Drug Medi-Cal Services (DMC) for county citizens. The Plan is governed by a Board of Supervisors and contracts with the Department of Health Care Services (DHCS) for the purpose of supporting the Substance Use Disorder (SUD) needs of the community.

The Plan is located southeast of Sacramento. In Fiscal Year 2022, the population was estimated at approximately 41,412 residents, which includes a state prison. Approximately ten percent of the County's estimated 9,938 Medi-Cal recipients are receiving SUD services.

II. EXECUTIVE SUMMARY

This report presents the audit findings of the DHCS audit of the Plan's DMC program for the period of July 1, 2022, through June 30, 2023. The audit was conducted from April 2, 2024, through April 12, 2024. The audit consisted of document review, verification studies, and interviews with the Plan's representatives.

An Exit Conference with the Plan was held on August 20, 2024. The Plan was allowed 15 calendar days from the date of the Exit Conference to provide supplemental information addressing the draft audit findings. On September 4, 2024, the Plan submitted a response after the Exit Conference. The results of evaluation of the Plan's response are reflected in this report.

The audit evaluated three categories of performance: Availability of DMC Services, Quality Assurance and Performance Improvement, and Program Integrity.

The prior DHCS compliance report, covering review period July 1, 2021, through June 30, 2022, identified deficiencies incorporated in the Corrective Action Plan (CAP). The prior year CAP was not completely closed at the time of onsite; however, this year's audit included a review of documents to determine the implementation and effectiveness of the Plan's corrective actions.

Findings denoted as repeat findings are uncorrected deficiencies substantially similar to those identified in the previous audit.

The summary of the findings by category follows:

Category 1 –Availability of DMC Services

The Contractor shall establish assessment and referral procedures and shall arrange, provide, or subcontract for covered services in the contractor's service area covered services. The Plan did not demonstrate that the DMC services for Naltrexone Treatment and Perinatal Residential Substance Abuse Services were arranged, provided or subcontracted.

Category 3 - Quality Assurance and Performance Improvement

There were no findings noted for this category during the audit period.

Category 7 – Program Integrity

There were no findings noted for this category during the audit period.

III. SCOPE/AUDIT PROCEDURES

SCOPE

The DHCS, Contract and Enrollment Review Division conducted this audit of the Plan to ascertain that medically necessary services provided to beneficiaries comply with federal and state laws, Medi-Cal regulations and guidelines, and the state's DMC Contract.

PROCEDURE

DHCS conducted an audit of the Plan from April 2, 2024, through April 12, 2024, for the audit period of July 1, 2022, through June 30, 2023. The audit included a review of the Plan's policies for providing services, the procedures to implement these policies, and the process to determine whether these policies were effective. Documents were reviewed and interviews were conducted with Plan representatives.

No verification studies were conducted for this audit.

❖ COMPLIANCE AUDIT FINDINGS ❖

PLAN: AMADOR COUNTY DRUG MEDI-CAL SERVICES

AUDIT PERIOD: July 1, 2022, through June 30, 2023

DATES OF AUDIT: April 2, 2024, through April 12, 2024

CATEGORY 1 – AVAILABILITY OF DRUG MEDI-CAL SERVICES

1.1	Covered Services
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1.1.1 Naltrexone and Perinatal Services Provision.

The Plan shall establish assessment and referral procedures and shall arrange, provide, or subcontract for covered services in the Contractor’s service area. Covered services include:

- Outpatient Drug-Free Treatment
- Narcotic Treatment Program Services
- Naltrexone Treatment
- Intensive Outpatient Treatment
- Perinatal Residential Substance Abuse Services

(DMC Contract, Exhibit A, Attachment I, Part I, Section 2 Covered Services, A Covered Services, 1, a-e)

For Counties not currently providing all covered DMC services, the Department requires the following:

- Any County not currently contracting with the Department for the provision of DMC services shall affirm, in writing, by February 28, 2018, that it will enter into a contract with the Department to provide DMC services.
- Any DMC contracting County that is not fulfilling its contractual obligations shall affirm, in writing, by February 28, 2018, that it is arranging, providing, or subcontracting for all DMC services within that County as required by that County’s contract.

(BHIN 18-009; Diversion of County Behavioral Health Subaccount (BHS) Allocations for Drug Medi-Cal Services, p.3)

The Plan’s policy 7-560, *Consultation Meeting – Level of Care Determination and Referral (effective 03/03/2023)*, describes the Plan’s commitment to execute following DMC services referrals:

- Outpatient services – provided at Amador County Behavioral Health
- Intensive Outpatient services – provided at Amador County Behavioral Health
- Perinatal Residential services – provided outside Amador County
- Narcotic Treatment Program (NTP) – provided via subcontractor.
- Medication Assisted Treatment (MAT) – provided via subcontractor.

❖ COMPLIANCE AUDIT FINDINGS ❖

PLAN: AMADOR COUNTY DRUG MEDI-CAL SERVICES

AUDIT PERIOD: July 1, 2022, through June 30, 2023

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Finding: The Plan did not demonstrate that the DMC services for Naltrexone Treatment and Perinatal Residential Substance Abuse Services were arranged, provided or subcontracted.

The review of *Amador Master Provider File (MPF)* and *Out of County Referral Log (OOCR)* did not list subcontracted providers who offered Perinatal Residential Substance Abuse Services.

In the interview, the Plan stated that they have established contracts with Progress House for Perinatal Residential Substance Abuse Services and Well Space Health for Naltrexone services.

The Plan did not demonstrate compliance with the requirement to subcontract for covered services such as Naltrexone Treatment and Perinatal Residential Substance Abuse Services. The Plan did not provide the requested copies of fully executed contracts with the two indicated contracted providers during the audit period, Progress House and Week Space Health.

When the Plan does not ensure the provision of Perinatal Residential Substance Use Disorder Treatment Services or Naltrexone Services, eligible beneficiaries will not be provided necessary DMC services to treat their SUD.

This is a repeat of the fiscal year 2021-2022 – DMC Covered Services

Recommendation: Establish assessment, placement determination and referral procedures and subcontracts for covered services including Perinatal Residential Substance Use Disorder Treatment and Naltrexone services.