



July 7, 2023

THIS LETTER SENT VIA EMAIL TO: Skennelly@buttecounty.net

Mr. Scott Kennelly, Director
Butte County Department of Behavioral Health
3217 Cohasset Ave
Chico, CA 95973

SUBJECT: ANNUAL COUNTY COMPLIANCE SECTION DMC FINDINGS REPORT

Dear Director Kennelly:

The Department of Health Care Services (DHCS) is responsible for monitoring compliance to requirements of the Drug Medi-Cal (DMC) Contract operated by Butte County.

The County Compliance Section (CCS) within Audits and Investigations (A&I) of DHCS conducted a review of the County's compliance with contract requirements based on responses to the monitoring protocol, discussion with County staff, and supporting documentation provided by the County. Enclosed are the results of Butte County's Fiscal Year (FY) 2022-23 DMC compliance review. The report identifies deficiencies, required corrective actions, advisory recommendations, and referrals for technical assistance.

Butte County is required to submit a Corrective Action Plan (CAP) addressing each compliance deficiency (CD) to the Medi-Cal Behavioral Health – Oversight and Monitoring Division (MCBH-OMD), County/Provider Operations and Monitoring Branch (CPOMB) Liaison by 9/07/2023. Please use the enclosed CAP form to submit the completed CAP and supporting documentation via the MOVEit Secure Managed File Transfer System. For instructions on how to submit to the correct MOVEit folder, email MCBHOmdMonitoring@dhcs.ca.gov.

If you have any questions, please contact me at emanuel.hernandez@dhcs.ca.gov.

Sincerely,

Emanuel Hernandez | County Compliance Monitoring II Analyst

Distribution:

To: Director Kennelly,

Cc: Mateo Hernandez, Audits and Investigations, Contract and Enrollment Review
Division Chief
Catherine Hicks, Audits and Investigations, Behavioral Health Compliance
Branch Chief
Ayesha Smith, Audits and Investigations, County Compliance Section Chief
Michael Bivians, Audits and Investigations, County Compliance Monitoring II
Chief
Cindy Berger, Audits and Investigations, Provider Compliance Section Chief
Sergio Lopez, County/Provider Operations and Monitoring Section I Chief
Tony Nguyen, County/Provider Operations and Monitoring Section II Chief
MCBHOMDMonitoring@dhcs.ca.gov, County/Provider Operations and
Monitoring Branch
Jennifer Stofa, Butte County Behavioral Health Assistant Director

COUNTY REVIEW INFORMATION

County:

Butte

County Contact Name/Title:

Jennifer Stofa, Assistant Director

County Address:

3217 Cohasset Rd.
Chico, CA 95973

County Phone Number/Email:

(530) 854-0030
JStofa@buttecounty.net

Date of Review:

4/14/2023

Lead CCM Analyst:

Emanuel Hernandez

Assisting CCM Analyst:

N/A

Report Prepared by:

Emanuel Hernandez

Report Approved by:

Ayesha Smith

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) 2021-22 State-County Contract, herein referred to as State County Contract
 - b. Fiscal Year (FY) 2022-23 State-County Contract, herein referred to as State County Contract
 - c. Mental Health and Substance Use Disorders Services (MHSUDS) Information Notices
 - d. Behavioral Health Information Notices (BHIN)

ENTRANCE AND EXIT CONFERENCE SUMMARIES

Entrance Conference:

An Entrance Conference was conducted via WebEx on 4/14/2023. The following individuals were present:

- Representing DHCS:
Emanuel Hernandez, County Compliance Monitoring II (CCM II) Analyst
Mary Shanahan, County/Provider Operations and Monitoring Branch (CPOMB) Analyst
- Representing Butte County:
Scott Kennelly, Director of Behavioral Health
Bianca Naron, Behavioral Health Compliance Officer
Melody Robinson, Senior Program Manager of Behavioral Health
Michelle Perez, Quality Management Clinician
Danelle Campbell, Behavioral Health Program Manager
Jacob Read, Senior Program Manager of Behavioral Health
Daniel Moore, Behavioral Health Substance Use Disorder Counselor Supervisor
Andrew Howell, Information Technology Analyst II
Molly Coughlin, Compliance Analyst and Patient's Rights Advocate
Goldie Kretschmar, Quality Management Analyst

During the Entrance Conference, the following topics were discussed:

- Introductions
- Overview of review process
- Butte County overview of services provided

Exit Conference:

An Exit Conference was conducted via WebEx on 4/14/2023. The following individuals were present:

- Representing DHCS:
Emanuel Hernandez, CCM II Analyst
Mary Shanahan, CPOMB Analyst
- Representing Butte County:
Scott Kennelly, Director of Behavioral Health
Bianca Naron, Behavioral Health Compliance Officer
Melody Robinson, Senior Program Manager of Behavioral Health
Michelle Perez, Quality Management Clinician
Danelle Campbell, Behavioral Health Program Manager
Jacob Read, Senior Program Manager of Behavioral Health
Daniel Moore, Behavioral Health Substance Use Disorder Counselor Supervisor
Andrew Howell, Information Technology Analyst II
Molly Coughlin, Compliance Analyst and Patient's Rights Advocate
Goldie Kretzschmar, Quality Management Analyst

During the Exit Conference, the following topics were discussed:

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

SUMMARY OF FY 2022-23 COMPLIANCE DEFICIENCIES (CD)

<u>Section</u>	<u>Number of CDs</u>
1.0 Administration	0
2.0 Program Integrity	0
3.0 Perinatal Practice Guidelines	1
4.0 Youth Services	1
5.0 Reporting Requirements	1

Category 3: PERINATAL PRACTICE GUIDELINES

A review of the County's Perinatal Practice Guidelines was conducted to ensure compliance with applicable regulations, and standards. The following DMC deficiency in regulations, standards, or protocol requirements was identified:

COMPLIANCE DEFICIENCY:

CD 3.1:

DMC Contract, Exhibit A, Attachment I AI, Part II, I

I. Perinatal Practice Guidelines

The Contractor will follow the guidelines in Document 1G, "Perinatal Practice Guidelines," in developing and implementing perinatal treatment and recovery programs funded under this Exhibit, until new Perinatal Practice Guidelines are established and adopted. No formal amendment of this Contract is required for new guidelines to be incorporated into this Contract.

Perinatal Practice Guidelines Section B, 4

1. SUD providers shall coordinate treatment services with other appropriate services, including health, criminal justice, social, educational, and vocational rehabilitation as well as additional services that are medically necessary to prevent risk to a fetus, infant, or mother. Providers shall also provide or arrange for transportation to ensure access to treatment.

Findings: The County did not provide evidence of compliance demonstrating the following Perinatal Practice Guidelines requirements:

- Coordination with other services (health, criminal justice, social services, educational services, and vocational rehabilitation).

Category 4: YOUTH SERVICES

A review of the County's Youth Services was conducted to ensure compliance with applicable regulations, and standards. The following DMC deficiency in regulations, standards, or protocol requirements was identified:

COMPLIANCE DEFICIENCY:

CD 4.1:

DMC Contract, Exhibit A, Attachment I A1, Part II, J

J. Youth Treatment Guidelines

The Contractor will follow the guidelines in Document 1V, "Youth Treatment Guidelines," in developing and implementing youth treatment programs funded under this Exhibit, until new Youth Treatment Guidelines are established and adopted. No formal amendment of this Contract is required for new guidelines to be incorporated into this Contract.

Adolescent Best Practices Guidelines 3.1.6

Case Management and Care Coordination

Adolescents are often involved in multiple systems while in or on their path to treatment and throughout their recovery (see Systems Collaboration section for additional information). Effective adolescent services coordinate with the adolescent's family and with professionals from the various systems with which he or she interacts (e.g., mental health, physical health care, education, social services, child welfare, and juvenile justice). Involvement of these professionals, as identified by the team, assists in developing and executing a comprehensive treatment plan. Case managers (e.g., care coordinators) provide continuous support for the adolescents, ensuring there are linkages.

Findings: The County did not provide evidence of compliance demonstrating the following Case Management and Care Coordination Services are offered:

- Coordination with adolescent's family.
- Coordination with mental health services.
- Coordination with physical health care services.
- Coordination with social services.
- Coordination with child welfare.
- Coordination with juvenile justice.

Category 5: REPORTING REQUIREMENTS

A review of the County's reporting requirements was conducted to ensure compliance with applicable regulations, and standards. The following DMC deficiency in regulations, standards, or protocol requirements was identified:

COMPLIANCE DEFICIENCY:

CD 5.1:

DMC Contract, Exhibit A, Attachment I A1, Part III; C, 3-6

3. Electronic submission of CalOMS-Tx data shall be submitted by the Contractor within 45 days from the end of the last day of the report month.
4. The Contractor shall comply with data collection and reporting requirements established by the DHCS CalOMS-Tx Data Collection Guide (Document 3J) and all former Department of Alcohol and Drug Programs Bulletins and DHCS Information Notices relevant to CalOMS-Tx data collection.
5. The Contractor shall submit CalOMS-Tx admission, discharge, annual update, resubmissions of records containing errors or in need of correction, and "provider no activity" report records in an electronic format approved by DHCS.
6. The Contractor shall comply with the CalOMS-Tx Data Compliance Standards established by DHCS identified in Document 3S for reporting data content, data quality, data completeness, reporting frequency, reporting deadlines, and reporting method.

Findings: The County's Open Admissions Report is out of compliance.

TECHNICAL ASSISTANCE

Butte County did not request any technical assistance during this review.