



August 5, 2025

THIS LETTER SENT VIA EMAIL TO: Georgina.Yoshioka@dbh.sbcounty.gov

Georgina Yoshioka, Behavioral Health Director
San Bernardino County Department of Behavioral Health
303 E Vanderbilt Way
San Bernardino, CA 92415

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

Dear Director Yoshioka:

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

San Bernardino County is required to submit a Corrective Action Plan (CAP) addressing each review finding noted to DHCS's 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 emanuel.hernandez@dhcs.ca.gov.

Sincerely,

Emanuel Hernandez | Analyst

Distribution:

To: Director Yoshioka,

CC: Mateo Hernandez, PhD, Assistant Deputy Director
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BHOMDMonitoring@dhcs.ca.gov, Behavioral Health County Support and
Operations Branch

Christopher Bailey, Supervising Program Specialist (SPS), Department of
Behavioral Health (DBH)

COUNTY REVIEW INFORMATION

County:

San Bernardino

County Contact Name/Title:

Christopher Bailey, SPS, DBH

County Address:

658 E. Brier Dr., Suite 250
San Bernardino, CA 92408

County Phone Number/Email:

Christopher.Bailey@dbh.sbcounty.gov
(909) 501-0719

Date of DMC-ODS Implementation:

03/01/2018

Date of Review:

04/24/2025

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 4/24/2025. The following individuals were present:

- Representing DHCS:
Emanuel Hernandez, Analyst, SUDRS Unit 2
Jonette La Rue, Chief, SUDRS Unit 2
Caitlin Martinez, Chief, Behavioral Health Services Act (BHSA) Program Compliance and Monitoring (PCM) Unit 2
Joel Case, County Liaison, BHSA PCM Unit 2
Leilani Kwon, Chief, CCMS Unit 2
Elida Boyden, County Liaison, CCMS Unit 2

- Representing San Bernardino County:
Christopher Bailey, SPS, DBH
Michael Sweitzer, Senior Program Manager, DBH
Natalie Kesse, Senior Program Manager, DBH Administrative and Fiscal Services
Robert LoPatriello, Supervising Social Worker, DBH
Kisha Jenkins, Program Specialist I, DBH
Amber Carpenter, Deputy Director, DBH
Anthony Saldana, Staff Analyst II, DBH
Gustavo Cisneros, Program Manager I, DBH
Erica Ochoa, Chief Compliance Officer, DBH Office of Compliance
Sara Hayes, Program Manager II, DBH Quality Management
Kinshasa Hamilton, Compliance Manager, DBH Quality Management
Artemio Moran, Program Specialist II, DBH
Rafael Villa, Program Manager I, DBH
Gloria Ugwula, Staff Analyst II, DBH Quality Management
Alice Trivison, Senior Program Manager
Marti Baca, Program Specialist I, DBH
Leslie Ruiz, County Programs Liaison, Integrated Care, Inland Empire Health Plan (IEHP)
Metra Jaber, Program Manager II, DBH
Briceida Tompkins, Ethics and Compliance Coordinator, DBH Office of Compliance
Matty Grounds, Program Manager II, DBH

Marlen Zanetti, Administrative Manager, DBH Administrative and Fiscal Services
April Guzman, Administrative Manager, DBH Revenue Cycle
Laurence Gonzaga, Program Manager, Behavioral Health, Molina Healthcare of
CA

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 4/24/2025. The following individuals were present:

- Representing DHCS:
 - Emanuel Hernandez, Analyst, SUDRS Unit 2
 - Jonette La Rue, Chief, SUDRS Unit 2
 - Caitlin Martinez, Chief, BHSA PCM Unit 2
 - Joel Case, County Liaison, BHSA PCM Unit 2
 - Leilani Kwon, Chief, CCMS Unit 2
 - Elida Boyden, County Liaison, CCMS Unit 2

- Representing San Bernardino County:
 - Christopher Bailey, Supervising Program Specialist, DBH
 - Michael Sweitzer, Senior Program Manager, DBH
 - Natalie Kesse, Senior Program Manager, DBH Administrative and Fiscal Services
 - Robert LoPatriello, Supervising Social Worker, DBH
 - Kisha Jenkins, Program Specialist I, DBH
 - Amber Carpenter, Deputy Director, DBH
 - Anthony Saldana, Staff Analyst II, DBH
 - Gustavo Cisneros, Program Manager I, DBH
 - Erica Ochoa, Chief Compliance Officer, DBH Office of Compliance
 - Sara Hayes, Program Manager II, DBH Quality Management
 - Kinshasa Hamilton, Compliance Manager, DBH Quality Management
 - Artemio Moran, Program Specialist II, DBH
 - Rafael Villa, Program Manager I, DBH
 - Gloria Ugwula, Staff Analyst II, DBH Quality Management
 - Alice Trivison, Senior Program Manager
 - Marti Baca, Program Specialist I, DBH
 - Leslie Ruiz, County Programs Liaison, Integrated Care, Inland Empire Health Plan (IEHP)
 - Metra Jaber, Program Manager II, DBH
 - Briceida Tompkins, Ethics and Compliance Coordinator, DBH Office of Compliance
 - Matty Grounds, Program Manager II, DBH
 - Marlen Zanetti, Administrative Manager, DBH Administrative and Fiscal Services
 - April Guzman, Administrative Manager, DBH Revenue Cycle
 - Laurence Gonzaga, Program Manager, Behavioral Health, Molina Healthcare of CA

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.

TECHNICAL ASSISTANCE

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