



March 4, 2025

THIS LETTER SENT VIA EMAIL TO: sholt@fresnocountyca.gov

Susan Holt, Director of Behavioral Health and Public Guardian
Fresno County Department of Behavioral Health
1925 E. Dakota Avenue
Fresno, CA 93726

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

Dear Director Holt:

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

Fresno County is required to submit a Corrective Action Plan (CAP) addressing each review finding noted to DHCS' Behavioral Health – Oversight and Monitoring Division (BHOMD), 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 jade.liu@dhcs.ca.gov.

Sincerely,

Jade Liu | Health Program Specialist I

Distribution:

To: Director Holt,

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

Jeffrey Elliot, Quality Improvement Coordinator
Fresno County Behavioral Health

COUNTY REVIEW INFORMATION

County:

Fresno

County Contact Name/Title:

Jeffrey Elliot, Quality Improvement Coordinator

County Address:

1925 E. Dakota Avenue
Fresno, CA 93726

County Phone Number/Email:

559-600-9118

jelliott@fresnocountyca.gov

Date of DMC-ODS Implementation:

7/1/2019

Date of Review:

12/17/2024

Lead SUDRS Reviewer:

Jade Liu

Report Prepared by:

Jade Liu

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 12/17/2024. The following individuals were present:

- Representing DHCS:
Michael Bivians, Chief, SUDRS
Jade Liu, Health Program Specialist (HPS) I, SUDRS
Marcia Casado, Unit Chief, County Liaison Operations Support
- Representing Fresno County:
Susan Holt, Director of Behavioral Health and Public Guardian
Ahmadreza Bahrami, Division Manager
Natalie Morgan, Senior Substance Use Disorder (SUD) Specialist
Amanda Sayers, Clinical Supervisor, SUD
Michael Miller, Division Manager
Jeffrey Elliott, Quality Improvement Coordinator
Diego Garcia, Utilization Review Specialist, Plan Admin SUD
Hong Vo, Clinical Supervisor
Michael Muro, Program Manager
Sharon Erwin, Senior Staff Analyst
Natalie Armitstead, Division Manager
Le, Maryann Deputy Director
Elizabeth A Vasquez, Compliance Officer
Gleyra Castro, Division Manager
Lesby Flores, Deputy Director
Cesar Rodriguez Perez, Senior Staff Analyst
Joseph Rangel, Division Manager
Christopher Schreiber, Utilization Review Specialist, SUD Services
Ryan Moench, Senior Substance Abuse Specialist
Kathryn Sleboda, Business Systems Analyst
Bai Hounaviengkham, Division Manager
Emma Rasmussen, Deputy Director
Luisa Parra-Sanchez, Division Manager
David Hart, Staff Analyst
Sue Vang, Senior Staff Analyst
Rita Mehia, Division Manager

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 12/17/2024. The following individuals were present:

- Representing DHCS:
Michael Bivians, Chief, SUDRS
Jade Liu, HPS I, SUDRS
Marcia Casado, Unit Chief, County Liaison Operations Support

- Representing Fresno County:
Susan Holt, Director of Behavioral Health, and Public Guardian
Ahmadreza Bahrami, Division Manager
Natalie Morgan, Senior SUD Specialist
Amanda Sayers, Clinical Supervisor, SUD
Michael Miller, Division Manager
Jeffrey Elliott, Quality Improvement Coordinator
Diego Garcia, Utilization Review Specialist, Plan Admin SUD
Hong Vo, Clinical Supervisor
Michael Muro, Program Manager
Sharon Erwin, Senior Staff Analyst
Natalie Armitstead, Division Manager
Le, Maryann Deputy Director
Elizabeth A Vasquez, Compliance Officer
Gleyra Castro, Division Manager
Lesby Flores, Deputy Director
Cesar Rodriguez Perez, Senior Staff Analyst
Joseph Rangel, Division Manager
Christopher Schreiber, Utilization Review Specialist, SUD Services
Ryan Moench, Senior Substance Abuse Specialist
Kathryn Sleboda, Business Systems Analyst
Bai Hounaviengkham, Division Manager
Emma Rasmussen, Deputy Director
Luisa Parra-Sanchez, Division Manager
David Hart, Staff Analyst
Sue Vang, Senior Staff Analyst
Rita Mehia, Division 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	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.
- Audio formatted documentation (audio CD).
- Accessible electronic format (data CD).

TECHNICAL ASSISTANCE

Fresno County did not request technical assistance during this review.