

March 19, 2025

THIS LETTER SENT VIA EMAIL TO: tvartan@stanbhhs.org

Tony Vartan, MSW, LCSW, Behavioral Health Director
Stanislaus County Behavioral Health & Recovery Services
1601 E St., Suite 200, Second Floor
Modesto, CA 95354

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

Dear Director Vartan:

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

Stanislaus 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. 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 Vartan,

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

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Contract and Enrollment Review Division - Audits and Investigations

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

Nasrin Safi, Quality Services (QS) & Risk Manager III
Stanislaus County Behavioral Health & Recovery Services

Gurmanpreet Kaur, QS Manager II
Stanislaus County Behavioral Health & Recovery Services (BHRS)

COUNTY REVIEW INFORMATION

County:

Stanislaus

County Contact Name/Title:

Gurmanpreet Kaur, QS Manager II

County Address:

1130 12th Street, Ste C
Modesto, CA 95354

County Phone Number/Email:

209-525-6043

gkaur@stanbhrs.org

Date of DMC-ODS Implementation:

4/1/2019

Date of Review:

1/15/2025

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 1/15/2025. The following individuals were present:

- Representing DHCS:
Emanuel Hernandez, Analyst, SUDRS Unit 2
- Representing Stanislaus County:
Nasrin Safi, QS & Risk Manager III
Gurmanpreet Kaur, QS Manager II
Keri Magee, Assistant Director, Clinical Operations
Abraham Andres, Chief, Adult System of Care
Bee Thao, QS Specialist
Brittney Kirkland, Chief, Crisis, Access & Medication Services
Cam Quach, Information Technology (IT) Staff Services Analyst
Charles Yarnell, Substance Use Disorder (SUD) Manager II
Cory Taylor, Care Coordination Team, Behavioral Health Coordinator
Danielle Banning, Outcomes & Evaluation Monitoring, Staff Services Analyst
David Diaz, SUD Mental Health Coordinator
Edessa Pourkaldani, Human Resource (HR) Manager II
Elizabeth Pike, Stanislaus Recovery Center, Behavioral Health Coordinator
Frances Gonzales, Adult Drug Court Behavioral Health Coordinator
Gabriela Marquez, Utilization Management Manager III
Jennifer Marsh, Prevention Services Coordinator
Jessie Lawrence, Stanislaus Recovery Center Behavioral Health Coordinator
Kim Saing, Chief, Children & Transitional Aged Youth System of Care
Lezzette Ervin, Behavioral Health Equity Manager II
Linnea Worthy, Compliance Analyst
Mary Cruz Vargas, QS Specialist
Megan Meija, Medical Records Coordinator
Megan Vylonis, Compliance Manager II & Privacy Officer
Monica Salazar, Chief, Behavioral Health Plan Administration
Natali Virgen, Workforce Development & Training, Staff Services Analyst
Nichole Schoene, QS Analyst
Paula McDowell, SUD Manager III
Paula Tucker, Compliance, Mental Health Clinician

Saksham Rana, Chief, Informational Technology Services
Sergio Landeros Jr., Workforce Development & Training, Staff Services
Coordinator
Sinan Dewitt, Contract Services Manager III
Sushma Patla, Crisis, Access, & Medication Services Manager III
Tabitha Sprague, Chief, SUD Services
Tiffany Bibbins, Medical Records Manager I
Tiffany Rivera, Senior Director, Sierra Vista Child & Family Services
Tracey McCullough, SUD Manager III
Vanessa Portillo, Fiscal Manager IV
Vanessa Torres, Compliance Analyst
Vick Guinard, QS Analyst
Yeng Lysaythong, Business Office Manager II
Amber Hayslett – Atkison, Workforce Development & Training Mental Health
Coordinator
Samuel Groves, Assistant Director, Chief Fiscal Officer
Emily Beecroft, Program Supervisor, Sierra Vista First Step Perinatal Program

During the Entrance Conference, the following topics were discussed:

- Introductions
- DHCS overview of review process
- Stanislaus County overview of services provided

Exit Conference:

An Exit Conference was conducted via Teams on 1/15/2025. The following individuals were present:

- Representing DHCS:
Emanuel Hernandez, Analyst, SUDRS Unit 2
- Representing Stanislaus County:
Nasrin Safi, QS & Risk Manager III
Gurmanpreet Kaur, QS Manager II
Keri Magee, Assistant Director, Clinical Operations
Abraham Andres, Chief, Adult System of Care
Bee Thao, QS Specialist
Brittney Kirkland, Chief, Crisis, Access & Medication Services
Cam Quach, IT Staff Services Analyst
Charles Yarnell, SUD Manager II
Cory Taylor, Care Coordination Team, Behavioral Health Coordinator
Danielle Banning, Outcomes & Evaluation Monitoring, Staff Services Analyst
David Diaz, SUD Mental Health Coordinator
Edessa Pourkaldani, HR Manager II
Elizabeth Pike, Stanislaus Recovery Center, Behavioral Health Coordinator
Frances Gonzales, Adult Drug Court Behavioral Health Coordinator
Gabriela Marquez, Utilization Management Manager III
Jennifer Marsh, Prevention Services Coordinator
Jessie Lawrence, Stanislaus Recovery Center Behavioral Health Coordinator
Kim Saing, Chief, Children & Transitional Aged Youth System of Care
Lezzette Ervin, Behavioral Health Equity Manager II
Linnea Worthy, Compliance Analyst
MaryCruz Vargas, QS Specialist
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Natali Virgen, Workforce Development & Training, Staff Services Analyst
Nichole Schoene, QS Analyst
Paula McDowell, SUD Manager III
Paula Tucker, Compliance, Mental Health Clinician
Saksham Rana, Chief, Informational Technology Services
Sergio Landeros Jr., Workforce Development & Training, Staff Services Coordinator
Sinan Dewitt, Contract Services Manager III
Sushma Patla, Crisis, Access, & Medication Services Manager III
Tabitha Sprague, Chief, SUD Services
Tiffany Bibbins, Medical Records Manager I

Tiffany Rivera, Senior Director, Sierra Vista Child & Family Services
Tracey McCullough, SUD Manager III
Vanessa Portillo, Fiscal Manager IV
Vanessa Torres, Compliance Analyst
Vick Guinard, QS Analyst
Yeng Lysaythong, Business Office Manager II
Amber Hayslett – Atkison, Workforce Development & Training Mental Health
Coordinator
Samuel Groves, Assistant Director, Chief Fiscal Officer
Emily Beecroft, Program Supervisor, Sierra Vista First Step Perinatal Program

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	2
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.

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).

Findings: 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, the following:

- Braille documentation.

Category 5: COVERAGE AND AUTHORIZATION OF SERVICES

A review of the County's Coverage and Authorization of Services 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 findings were identified:

COMPLIANCE FINDINGS:

5.1.7:

Exhibit A Attachment I, Section III Program Specifications, G, 3, iv-viii

- iv. Provide prior authorization for residential services within 24 hours of the prior authorization request being submitted by the provider.
 - a. Prior authorization is prohibited for non-residential DMC-ODS services.
 - b. The Contractor's prior authorization process shall comply with the parity requirements set forth in 42 CFR §438.910(d).
- v. Review the DSM and ASAM Criteria documentation to ensure that the beneficiary meets the requirements for the service.
- vi. Have written policies and procedures for processing requests for initial and continuing authorization of services.
- vii. Have a mechanism in place to ensure that there is consistent application of review criteria for authorization decisions and shall consult with the requesting provider when appropriate.
- viii. Track the number, percentage of denied, and timeliness of requests for authorization for all DMC-ODS services that are submitted, processed, approved, and denied.

Findings: The Plan did not provide evidence demonstrating County and subcontractor compliance for prior authorizations. The following elements were not followed:

- Track the number, percentage of denied, and timeliness of requests for authorization for all DMC-ODS services that are submitted, processed, approved, and denied.

5.4.2:

Exhibit A Attachment I, Section II Federal Requirements, G, 2, i-ii

2. Timely and Adequate Notice of Adverse Benefit Determination (42 CFR § 438.404)

a. Notice.

- a. The Contractor shall give beneficiaries timely and adequate notice of an adverse benefit determination, in writing, and consistent with the requirements below and in 42 CFR §438.10.

b. Content of notice.

- a. The notice shall explain the following:
 - i. The adverse benefit determination the Contractor has made or intends to make.
 - ii. The reasons for the adverse benefit determination, including the right of the beneficiary to be provided upon request and free of charge, reasonable access to and copies of all documents, records, and other information relevant to the beneficiary's adverse benefit determination. Such information includes DMC-ODS criteria for services, and any processes, strategies, or evidentiary standards used in setting coverage limits.
 - iii. The beneficiary's right to request an appeal of the Contractor's adverse benefit determination, including information on exhausting the Contractor's one level of appeal described at 42 CFR §438.402(b) and the right to request a state hearing consistent with 42 CFR §438.402(c).
 - iv. The procedures for exercising these appeal rights.
 - v. The circumstances under which an appeal process can be expedited and how to request it.
 - vi. The beneficiary's right to have benefits continue pending resolution of the appeal, how to request that benefits be continued, and the circumstances, consistent with state policy, under which the beneficiary may be required to pay the costs of these services.

Findings: The Plan did not provide evidence demonstrating County and subcontractor compliance with timely and adequate written notice of adverse benefit determination. The notice is missing the required following explanation or elements:

- The adverse benefit determination the Contractor has made or intends to make.

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 requirement and the State's DMC-ODS contract. The following finding was identified:

COMPLIANCE FINDING:

7.4.1:

Exhibit A Attachment I, Section II Federal Requirements, H, 7, i, a-f

7. Disclosures on Information and Ownerships Control

- i. The Contractor and its subcontractors shall provide the following disclosures through the DMC certification process described in Article III.K of the Agreement:
 - a. The name and address of any person (individual or corporation) with an ownership or control interest in the Contractor. The address for corporate entities shall include as applicable primary business address, every business location, and P.O. Box address.
 - b. Date of birth and Social Security Number (in the case of an individual).
 - c. Other tax identification number (in the case of a corporation) with an ownership or control interest in the disclosing entity (or fiscal agent or managed care entity) or in any subcontractor in which the disclosing entity (or fiscal agent or managed care entity) has a five percent or more interest. Whether the person (individual or corporation) with an ownership or control interest in the disclosing entity (or fiscal agent or managed care entity) is related to another person with ownership or control interest in the disclosing entity as a spouse, parent, child, or sibling; or whether the person (individual or corporation) with an ownership or control interest in any subcontractor in which the disclosing entity (or fiscal agent or managed care entity) has a five percent or more interest is related to another person with ownership or control interest in the disclosing entity as a spouse, parent, child, or sibling.
 - d. The name of any other disclosing entity (or fiscal agent or managed care entity) in which an owner of the disclosing entity (or fiscal agent or managed care entity) has an ownership or control interest.
 - e. The name, address, date of birth, and Social Security Number of any managing employee of the disclosing entity (or fiscal agent or managed care entity).

Findings: The Plan did not provide evidence demonstrating the County complies with providing the following disclosures through the DMC certification process described in Article III.K of the agreement: The following elements are missing:

- The name and address of any person (individual or corporation) with an ownership or control interest in the Contractor.

- The address for corporate entities shall include as applicable primary business address, every business location, and P.O. Box address.
- Date of birth and Social Security Number (in the case of an individual).
- Other tax identification number (in the case of a corporation) with an ownership or control interest in the disclosing entity (or fiscal agent or managed care entity) or in any subcontractor in which the disclosing entity (or fiscal agent or managed care entity) has a five percent or more interest.
- Whether the person (individual or corporation) with an ownership or control interest in the disclosing entity (or fiscal agent or managed care entity) is related to another person with ownership or control interest in the disclosing entity as a spouse, parent, child, or sibling; or whether the person (individual or corporation) with an ownership or control interest in any subcontractor in which the disclosing entity (or fiscal agent or managed care entity) has a five percent or more interest is related to another person with ownership or control interest in the disclosing entity as a spouse, parent, child, or sibling.
- The name of any other disclosing entity (or fiscal agent or managed care entity) in which an owner of the disclosing entity (or fiscal agent or managed care entity) has an ownership or control interest.
- The name, address, date of birth, and Social Security Number of any managing employee of the disclosing entity (or fiscal agent or managed care entity).

TECHNICAL ASSISTANCE

Stanislaus County did not request technical assistance.