

April 25, 2025

THIS LETTER SENT VIA EMAIL TO: loretta.denering@ventura.org

Ms. Loretta L. Denering, DrPH, MS, Director of Behavioral Health
Ventura County Behavioral Health
1911 Williams Drive, Suite 200
Oxnard, CA 93036

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

Dear Director Denering:

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

Ventura 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 Denering,

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

Sloane Burt, Ventura County Behavioral Health (VCBH), Quality Improvement
(QI) Manager

COUNTY REVIEW INFORMATION

County:

Ventura

County Contact Name/Title:

Sloane Burt, QI Manager

County Address:

1911 Williams Drive, Suite 200
Oxnard, CA 93036

County Phone Number/Email:

(805) 981-4214

Sloane.burt@ventura.org

Date of DMC-ODS Implementation:

12/01/2018

Date of Review:

1/23/2025

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 1/23/2025. The following individuals were present:

- Representing DHCS:
Emanuel Hernandez, Analyst, SUDRS Unit 2
- Representing Ventura County:
Aliona Paul, Program Administrator III, VCBH Policy Office
Dani Yomtov, Program Administrator III, QI
Sloan Burt, Behavioral Health (BH) Manager II, QI
Geneveve Zapeda, Clinical Nurse Manager II, Utilization Management (UM)
Dan Hicks, BH Manager II, Substance Use Services (SUS)
Jessica Davis, BH Substance Treatment Manager II
Leo Madina, BH, Access & Care Coordinator (ACC), Program Administrator III
Brianna Mirmiran, Program Administrator II, SUS, ACC
Leisa Donovan, BH, Senior Accounting Manager
Ruby Avila-Herrera, BH Manager II, Critical Care and Navigation Services (CCNS)
Serena Bezdjian, Research Psychologist (RP), QI
Maria Di Battista, BH Manager II, Substance Use Treatment Services (SUTS)
Jose L. Duran, Senior Program Administrator, SUS DMC-ODS Plan

During the Entrance Conference, the following topics were discussed:

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

Exit Conference:

An Exit Conference was conducted via Teams on 1/23/2025. The following individuals were present:

- Representing DHCS:
Emanuel Hernandez, Analyst, SUDRS Unit 2
- Representing Ventura County:
Aliona Paul, Program Administrator III, VCBH Policy Office
Dani Yomtov, Program Administrator III, QI
Sloan Burt, BH Manager II, QI
Geneveve Zapeda, Clinical Nurse Manager II, UM
Dan Hicks, BH Manager II, SUS
Jessica Davis, BH Substance Treatment Manager II
Leo Madina, BH, ACC, Program Administrator III
Brianna Mirmiran, Program Administrator II, SUS, ACC
Leisa Donovan, BH, Senior Accounting Manager
Ruby Avila-Herrera, BH Manager II, CCNS
Serena Bezdjian, RP, QI
Maria Di Battista, BH Manager II, SUTS
Jose L. Duran, Senior Program Administrator, SUS DMC-ODS Plan

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).

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.

TECHNICAL ASSISTANCE

Ventura County did not request technical assistance.