



August 16, 2024

THIS LETTER SENT VIA EMAIL TO: [tschirmer@marincounty.org](mailto:tschirmer@marincounty.org)

Mr. Todd Schirmer, Director  
Marin County Health and Human Services  
Behavioral Health and Recovery Services  
10 North Pedro Road, Suite 1015  
San Rafael, CA 94903

SUBJECT: ANNUAL COUNTY COMPLIANCE SECTION DMC-ODS FINDINGS REPORT

Dear Director Schirmer:

The Department of Health Care Services (DHCS) is responsible for monitoring compliance to requirements of the Drug Medi-Cal Organized Delivery System (DMC-ODS) Intergovernmental Agreement operated by Marin County.

The County Compliance Section (CCS) within Audits and Investigations (A&I) of DHCS conducted a review of the County's compliance with Federal and State regulations, program requirements and contractual obligations based on supporting documentation and interviews with County staff. Enclosed are the results of Marin County's Fiscal Year (FY) 2023-24 DMC-ODS compliance review. The report identifies deficiencies, advisory recommendations, and referrals for technical assistance.

Marin County is required to submit a Corrective Action Plan (CAP) addressing each compliance deficiency (CD) noted to DHCS' Medi-Cal Behavioral Health – Oversight and Monitoring Division (MCBH-OMD), County/Provider Operations and Monitoring Branch (CPOMB). For questions regarding the CAP process and submitting documentation, email your questions to [MCBHOMDMonitoring@dhcs.ca.gov](mailto:MCBHOMDMonitoring@dhcs.ca.gov). If you have any questions, please contact me at [emanuel.hernandez@dhcs.ca.gov](mailto:emanuel.hernandez@dhcs.ca.gov).

Sincerely,

Emanuel Hernandez | County Compliance Monitoring II Analyst

Distribution:

To: Director Schirmer,

Cc: Mateo Hernandez, Chief  
Contract and Enrollment Review Division - Audits and Investigations

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[MCBHOMDMonitoring@dhcs.ca.gov](mailto:MCBHOMDMonitoring@dhcs.ca.gov), County/Provider Operations and  
Monitoring Branch

Catherine Condon, Marin County Behavioral Health and Recovery Services  
(BHRS) Division Director

Jordan Hall Marin County Behavioral Health and Recovery Services (BHRS)  
Program Manager

## COUNTY REVIEW INFORMATION

**County:**

Marin

**County Contact Name/Title:**

Catherine Condon, Behavioral Health and Recovery Services (BHRS) Division Director

**County Address:**

North San Pedro Road  
San Rafael, CA 94903

**County Phone Number/Email:**

415-473-4218  
ccondon@marincounty.org

**Date of DMC-ODS Implementation:**

04/01/2017

**Date of Review:**

5/29/2024

**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) 2022-23 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 5/29/2024. The following individuals were present:

- Representing DHCS:  
Emanuel Hernandez, County Compliance Monitoring II (CCM II) Analyst
- Representing Marin County:  
Todd Schirmer, Behavioral Health and Recovery Services (BHRS) Director  
Catherine Condon, BHRS Division Director  
Jordan Hall, BHRS Program Manager  
Chris Baz, BHRS Senior Department Analyst  
Keely Martin, BHRS Department Analyst II  
Jacklyn Davis, BHRS Senior Program Coordinator  
Cynthia Nesbet, BHRS Senior Program Coordinator  
Roxana Yekta, BHRS Senior Program Coordinator  
Alex Troast, BHRS Senior Program Manager  
Jennifer Wasson, BHRS Administrative Service Associate  
Cameron Henn, BHRS Program Coordinator

During the Entrance Conference, the following topics were discussed:

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

### **Exit Conference:**

An Exit Conference was conducted via Teams on 5/29/2024. The following individuals were present:

- Representing DHCS:  
Emanuel Hernandez, CCM II Analyst
- Representing Marin County:  
Todd Schirmer, BHRS Director  
Catherine Condon, BHRS Division Director  
Jordan Hall, BHRS Program Manager  
Chris Baz, BHRS Senior Department Analyst  
Keely Martin, BHRS Department Analyst II  
Jacklyn Davis, BHRS Senior Program Coordinator  
Cynthia Nesbet, BHRS Senior Program Coordinator  
Roxana Yekta, BHRS Senior Program Coordinator  
Alex Troast, BHRS Senior Program Manager  
Jennifer Wasson, BHRS Administrative Service Associate  
Cameron Henn, BHRS Program Coordinator

During the Exit Conference, the following topics were discussed:

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

## **SUMMARY OF FY 2023-24 COMPLIANCE DEFICIENCIES (CD)**

<b><u>Category</u></b>	<b><u>Number of CDs</u></b>
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	0
5.0 Coverage and Authorization of Services	1
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 CPOMB liaison manages the progress of CAP completion.

For questions regarding the CAP form and instructions on how to complete the FY 2023-24 CAP, please email [MCBHOMDMonitoring@dhcs.ca.gov](mailto:MCBHOMDMonitoring@dhcs.ca.gov).



## **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 regulations, program requirements, and contractual obligations. The following deficiency was identified:

### **COMPLIANCE DEFICIENCY**

#### **CD 5.3.1:**

DMC-ODS Contract, Exhibit A Attachment I, Section III Program Specifications, LL, 4, c-g)

Open Admission and Open Provider Reporting

c. Electronic submission of CalOMS-Tx data shall be submitted by Contractor within 45 days from the end of the last day of the report month.

d. 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 and reporting requirements.

e. 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.

f. 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.

g. Contractor shall participate in CalOMS-Tx informational meetings, trainings, and conference calls.

**Findings:** The County did not ensure timely submission of beneficiary annual updates to the CalOMS-Tx system.

## **TECHNICAL ASSISTANCE**

Marin County did not make any technical assistance requests during this review.