



February 28, 2024

THIS LETTER SENT VIA EMAIL TO: [vkelly@ochca.com](mailto:vkelly@ochca.com)

Ms. Veronica Kelley, Behavioral Health Director  
Orange County Health Care Agency  
405 W. 5<sup>th</sup> Street, Ste. 212  
Santa Ana, CA 92701

SUBJECT: ANNUAL COUNTY COMPLIANCE SECTION DMC-ODS FINDINGS  
REPORT

Dear Director Kelley:

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 Orange 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 Orange County's Fiscal Year (FY) 2023-24 DMC-ODS compliance review. The report identifies deficiencies, advisory recommendations, and referrals for technical assistance.

Orange County is required to submit a Corrective Action Plan (CAP) addressing each compliance deficiency (CD) to DHCS' Medi-Cal Behavioral Health – Oversight and Monitoring Division (MCBH-OMD), County/Provider Operations and Monitoring Branch (CPOMB) Liaison by 4/29/2024. Please use the enclosed CAP form to submit the completed CAP and supporting documentation via the MOVEit Secure Managed File Transfer System. For instructions on how to submit to the correct MOVEit folder, email [MCBHOMDMonitoring@dhcs.ca.gov](mailto:MCBHOMDMonitoring@dhcs.ca.gov).

If you have any questions, please contact me at [michael.bivians@dhcs.ca.gov](mailto:michael.bivians@dhcs.ca.gov).

Sincerely,

Michael Bivians | Unit Chief

Distribution:

To: Director Kelley,

Cc: Mateo Hernandez, Audits and Investigations, Contract and Enrollment Review Division Chief  
Catherine Hicks, Audits and Investigations, Behavioral Health Review Branch Chief  
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Michael Bivians, Audits and Investigations, County Compliance Monitoring II Chief  
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Sergio Lopez, County/Provider Operations and Monitoring Section I Chief  
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[MCBHOMDMonitoring@dhcs.ca.gov](mailto:MCBHOMDMonitoring@dhcs.ca.gov), County/Provider Operations and Monitoring Branch  
Azahar Lopez, Quality Management Services Interim Assistance Deputy Director  
Chiyo Matsubayashi, Quality Management Services Health Services Manager

## COUNTY REVIEW INFORMATION

**County:**

Orange

**County Contact Name/Title:**

Chiyo Matsubayashi, LMFT, Health Services Manager

**County Address:**

400 W. Civic Center Drive  
Santa Ana, CA 92701

**County Phone Number/Email:**

(714) 796-0537  
cmatsubayashi@ochca.com

**Date of DMC-ODS Implementation:**

7/01/2018

**Date of Review:**

11/14/2023

**Lead CCM Analyst:**

Michael Bivians

**Assisting CCM Analyst:**

N/A

**Report Prepared by:**

Michael Bivians

**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 WebEx on 11/14/2023. The following individuals were present:

- Representing DHCS:  
Michael Bivians, County Compliance Monitoring 2 (CCM2) Unit Chief
- Representing Orange County:  
Chiyo Matsubayashi, Mental Health and Recovery Services (MHRS), Quality Management Services (QMS), Health Services Manager  
Azahar Lopez, MHRS, QMS, Interim Assistant Deputy Director  
Mark Lawrenz, MHRS, Substance Use Disorder (SUD), Interim Assistant Deputy Director  
Patricia De Marco, MHRS Medical Director  
Charles Huffman, MHRS, SUD, Associate Medical Director  
Adil Siddiqui, MHRS, Information Technology (IT), Chief Information Officer  
Glenda Aguilar, MHRS, SUD, Health Services Manager  
April Thornton, MHRS, SUD, Health Services Manager  
Carolyn Secrist, MHRS, SUD, Health Services Manager  
Diane Holley, MHRS, SUD, Health Services Manager Senior  
Esmerelda Carroll, MHRS, QMS, Behavioral Health Clinician II  
Dolores Casteneda, MHRS, QMS, Service Chief II  
Christy Read-Gomez, MHRS, SUD, Service Chief II  
David Castellanos, MHRS, IT, Information Security Officer  
Kindra Dimitriadis, MHRS, IT, Administrative Manager II  
Elaine Estrada, MHRS, QMS, Behavioral Health Clinician II  
Jennifer Fernandez, MHRS, QMS, Behavioral Health Clinician I  
Elizabeth Fraga, MHRS, QMS, Staff Specialist  
Michelle Glinski, MHRS, SUD, Health Program Specialist  
Hilary Peralta, MHRS, QMS, Service Chief II  
Marisela Ibarra, MHRS, QMS, Business Services Administrator  
Juan Corral, Health Care Agency (HCA) Procurement and Contract Services  
Kelly Sabet, HCA Office of Compliance, County Compliance Officer / Civil Rights Coordinator  
Kristine Mariscal, HCA Procurement and Contract Services, Administrative Manager I

Anthony Le, MHRS, Administration and Finance, Administrative Manager II  
Rebekah Radomski, MHRS, QMS, Service Chief II  
Sarah Nguyen, MHRS, SUD, Behavioral Health Clinician II  
Sherylove Saavedra, MHRS, QMS, Health Program Specialist  
Susan Weidhaas, MHRS, QMS, Health Services Administrator  
Susie Choi, MHRS, QMS, Health Program Specialist  
Annette Tran, MHRS, QMS, Health Services Administrator  
Wendy Elliott, MHRS, SUD, Service Chief II  
Elizabeth Bausman, MHRS, QMS, Health Services Analyst  
Nicole Duplesse, MHRS, SUD, Health Program Specialist  
Maria Linares, MHRS, SUD, Behavioral Health Clinician II  
David Rodriguez, HCA Procurement and Contract Services, Administrative Manager I  
Claudette Serrano, HCA Accounting, Business Services 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 WebEx on 11/14/2023. The following individuals were present:

- Representing DHCS:  
Michael Bivians, CCM2 Unit Chief
  
- Representing Orange County:  
Chiyo Matsubayashi, Mental Health and Recovery Services (MHRS), Quality Management Services (QMS), Health Services Manager  
Azahar Lopez, MHRS, QMS, Interim Assistant Deputy Director  
Mark Lawrenz, MHRS, Substance Use Disorder (SUD), Interim Assistant Deputy Director  
Patricia De Marco, MHRS Medical Director  
Charles Huffman, MHRS, SUD, Associate Medical Director  
Adil Siddiqui, MHRS, Information Technology (IT), Chief Information Officer  
Glenda Aguilar, MHRS, SUD, Health Services Manager  
April Thornton, MHRS, SUD, Health Services Manager  
Carolyn Secrist, MHRS, SUD, Health Services Manager  
Diane Holley, MHRS, SUD, Health Services Manager Senior  
Esmerelda Carroll, MHRS, QMS, Behavioral Health Clinician II  
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Elaine Estrada, MHRS, QMS, Behavioral Health Clinician II  
Jennifer Fernandez, MHRS, QMS, Behavioral Health Clinician I  
Elizabeth Fraga, MHRS, QMS, Staff Specialist  
Michelle Glinski, MHRS, SUD, Health Program Specialist  
Hilary Peralta, MHRS, QMS, Service Chief II  
Marisela Ibarra, MHRS, QMS, Business Services Administrator  
Juan Corral, Health Care Agency (HCA) Procurement and Contract Services  
Kelly Sabet, HCA Office of Compliance, County Compliance Officer / Civil Rights Coordinator  
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Rebekah Radomski, MHRS, QMS, Service Chief II

Sarah Nguyen, MHRS, SUD, Behavioral Health Clinician II  
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Susan Weidhaas, MHRS, QMS, Health Services Administrator  
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Nicole Duplesse, MHRS, SUD, Health Program Specialist  
Maria Linares, MHRS, SUD, Behavioral Health Clinician II  
David Rodriguez, HCA Procurement and Contract Services, Administrative  
Manager I  
Claudette Serrano, HCA Accounting, Business Services Manager

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	0
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. The CAP is due within sixty (60) calendar days of the date of this monitoring report.

Please provide the following within the completed FY 2023-24 CAP:

- a) A list of action steps to be taken to correct the CD.
- b) The name of the person who will be responsible for corrections and ongoing compliance.
- c) Provide a specific description on how ongoing compliance is ensured.
- d) A date of completion for each CD.

The CPOMB liaison will monitor progress of the CAP completion.

## **Category 7: PROGRAM INTEGRITY**

A review of the County's Program Integrity was conducted to ensure compliance with applicable Federal and State regulations, program requirements, and contractual obligations. The following deficiency was identified:

### **COMPLIANCE DEFICIENCY:**

#### **CD 7.2.4:**

DMC-ODS Contract, Exhibit A Attachment I, Section II Federal Requirements, H, 5, ii, h

Provision for the Contractor's suspension of payments to a network provider for which the Department determines there is a credible allegation of fraud in accordance with 42 CFR §455.23.

**Findings:** The Plan did not provide evidence it ensures it suspends payments to a network provider for which the Department determines there is a credible allegation of fraud in accordance with 42 CFR §455.23.

## **TECHNICAL ASSISTANCE**

Orange County requested Technical Assistance regarding subcontracting treatment services and ensuring proper reporting of data with DHCS' systems.