



September 3, 2024

THIS LETTER SENT VIA EMAIL TO: Matthew.Chang@ruhealth.org

Mr. Matthew Chang, MD, Director
Riverside University Health System-Behavioral Health
4095 County Circle Drive
Riverside, CA 92503

SUBJECT: ANNUAL COUNTY COMPLIANCE SECTION DMC-ODS FINDINGS
REPORT

Dear Director Chang:

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

Riverside 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.

If you have any questions, please contact me at michael.bivians@dhcs.ca.gov.

Sincerely,

Michael Bivians | Unit Chief

Distribution:

To: Director Chang,

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

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MCBHOMDMonitoring@dhcs.ca.gov, County/Provider Operations and
Monitoring Branch

Maureen Dopson
Riverside County University Health System-Behavioral Health Services
Quality Improvement Administrator

COUNTY REVIEW INFORMATION

County:

Riverside

County Contact Name/Title:

Maureen Dopson, Behavioral Health Services Quality Improvement Administrator

County Address:

4095 County Circle Drive
Riverside, CA 92503

County Phone Number/Email:

(951) 955-7146
MDopson@ruhealth.org

Date of DMC-ODS Implementation:

2/1/2017

Date of Review:

4/18/2024

Lead CCS Analyst:

Michael Bivians

Assisting CCS Analyst:

Jade Liu

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 Teams on 4/18/2024. The following individuals were present:

- Representing DHCS:
Michael Bivians, County Compliance Monitoring 2 (CCM2) Unit Chief
Jade Liu, CCM2 Health Program Specialist I (HPSI)
David Cannedy, County/Provider Operations and Monitoring (CPOM) Unit Chief
Alexis Maher, CPOM Liaison
- Representing Riverside County:
Maureen Dopson, Behavioral Health Services Quality Improvement Administrator
Rachel Romero, Supervisor Behavioral Health Services
Heidi Gomez, Assistant Regional Manager
April Frey, SUD Administrator
Joan Twohey-Jacobs, Administrative Services Manager
Laura Torres, Supervising OAI
Yajaira Carrillo, Administrative Services Supervisor
Cristina Penaranda, Senior Accountant
Cacia Salazar, Administrative Services Assistant
Rhyann Miller, Deputy Director Integrated Programs
Ashley Trevino-Kwong, Administrative Services Manager
Andrea Reino-Webb, Business Process Analyst III
Michael Blalock, Administrative Services Analyst
Lorraina Uribe, Administrative Services Supervisor

During the Entrance Conference, the following topics were discussed:

- DHCS and County staff introductions.
- Overview of review process.
- Overview of services provided.

Exit Conference:

An Exit Conference was conducted via Teams on 4/18/2024. The following individuals were present:

- Representing DHCS:
Michael Bivians, CCM2 Unit Chief
Jade Liu, CCM2 HPSI
David Cannedy, CPOM Unit Chief
Alexis Maher, CPOM Liaison

- Representing Riverside County:
Maureen Dopson, Behavioral Health Services Quality Improvement Administrator
Rachel Romero, Supervisor Behavioral Health Services
Heidi Gomez, Assistant Regional Manager
April Frey, SUD Administrator
Joan Twohey-Jacobs, Administrative Services Manager
Laura Torres, Supervising OAI
Yajaira Carrillo, Administrative Services Supervisor
Cristina Penaranda, Senior Accountant
Cacia Salazar, Administrative Services Assistant
Rhyann Miller, Deputy Director Integrated Programs
Ashley Trevino-Kwong, Administrative Services Manager
Andrea Reino-Webb, Business Process Analyst III
Michael Blalock, Administrative Services Analyst
Lorraina Uribe, Administrative Services Supervisor

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)

<u>Category</u>	<u>Number of CDs</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	0
5.0 Coverage and Authorization of Services	1
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 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.

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)

- 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.

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

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 7.3.4:

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

- e. Provision for a method to verify, by sampling or other methods, whether services that have been represented to have been delivered by network providers were received by beneficiaries and the application of such verification processes on a regular basis.

DMC-ODS Contract, Exhibit A Attachment I, Section III Program Specifications, HH, 1

1. Service Verification. To assist DHCS in meeting its obligation under 42 CFR 455.1(a)(2), the Contractor shall establish a mechanism to verify whether services were actually furnished to beneficiaries.

Finding: The Plan did not provide evidence that it has established a mechanism to verify whether services were actually furnished to beneficiaries.

TECHNICAL ASSISTANCE

Riverside County did not request technical assistance during this review.